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City Project No. 2000.048E

VOLUME III

TRANSBAY TERMINAL / CALTRAIN DOWNTOWN EXTENSION / REDEVELOPMENT PROJECT

in the City and County of San Francisco

DOCUMENTS DEPT.

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FINAL ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT AND SECTION 4(f) EVALUATION

WRITTEN PUBLIC COMMENTS AND PUBLIC HEARING TRANSCRIPTS ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT/ DRAFT ENVIRONMENTAL IMPACT REPORT AND DRAFT SECTION 4(f) EVALUATION

by the

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL TRANSIT ADMINISTRATION

and the

CITY AND COUNTY OF SAN FRANCISCO,
PENINSULA CORRIDOR JOINT POWERS BOARD, AND
SAN FRANCISCO REDEVELOPMENT AGENCY

March 2004

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Written Public Comments and Public Hearing Transcripts on the Transbay Terminal/Caltrain Downtown Extension/ Redevelopment EIS/EIR

INTRODUCTION

The Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Draft Environmental Impact Statement/Environmental Impact Report (Draft EIS/EIR) was released for public review on October 4, 2002. Notice of availability of the Draft EIS/EIR was published in the *San Francisco Independent* newspaper and posted at the Planning Department. 550 newsletters were sent to the mailing list announcing the availability of the Draft EIS/EIR, and a letter was sent directly to property owners whose properties could be directly affected by the Project. Fifty 11"X17" posters were posted throughout the Project area, including along Second Street. Notices were sent to all property owners within 300 feet of the project boundary as required by the San Francisco Administrative Code Chapter 31.

Enclosed are the written public comments and public hearing transcripts on the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Draft Environmental Impact Statement/ Environmental Impact Report.

Written Public Comments and Public Hearing Transcripts on the Transbay Terminal/ Caltrain Downtown Extension/Redevelopment Project

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I. Federal Agencies

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

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December 2, 2002

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the **Transbay Terminal / Caltrain Downtown Extension / Redevelopment Project**, in San Francisco, California (CEQ Number: 020417, ERP Number: FTA-K54028-CA). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act.

The Federal Transit Administration (FTA), City and County of San Francisco, Peninsula Corridor Joint Powers Board, and the San Francisco Redevelopment Agency jointly propose a three-part project: 1) a new, multi-modal Transbay Terminal on the site of the existing Transbay Terminal, 2) extension of Caltrain from its current San Francisco terminus at Fourth and Townsend Streets to a new underground terminus underneath the proposed new Transbay Terminal, and 3) establishment of a Redevelopment Area Plan with related development projects, including transit-oriented development on publically owned land in the vicinity of the new Transbay Terminal. In addition to the No Action Alternative, two alternatives are under consideration for each of the major project components. A preferred alternative is not identified.

EPA is highly supportive of the project goals to reduce vehicle miles traveled, reduce vehicle emissions, and to provide expanded transportation choices. We look forward to the successful implementation of this project. In our review of the document, we found that the DEIS sufficiently addresses the environmental impacts of the proposed alternatives. EPA has rated this document **LO, *Lack of Objections.*** This rating applies to all project options. Please see the attached *Rating Factors* for a description of our rating system.

While we have not identified environmental impacts requiring substantive changes to the document, we have identified opportunities for improving the air quality mitigation measures proposed during the construction phase of the project. Our comments are listed below.

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Air Quality – Construction

The DEIS includes several excellent mitigation measures for air quality emissions generated during construction (p.5-179). Because air quality impacts are of increasing human health and environmental concern, EPA recommends taking steps to reduce air quality impacts to the greatest extent possible. In addition to these mitigation measures, EPA strongly recommends that the Final Environmental Impact Statement (FEIS) address the following air quality issues:

- Identify sensitive receptors in the project area, including transit users.
- Include mitigation measures that detail how diesel emissions will be minimized for each phase of project construction, such as the use of electrically-powered equipment or alternative fueled machinery, where feasible. Where diesel-powered equipment is necessary, keep machinery well tuned and minimize unnecessary idling.
- Address how traffic congestion related to project construction can contribute to increased levels of carbon monoxide, especially at already congested intersections.
- Identify additional mitigation measures that will be implemented during high winds and smog alert days.

We appreciate the opportunity to review this DEIS. When the FEIS is completed, please send one copy to me at the address above (Mail Code: CMD-2) . If you have any questions or comments, please feel free to contact me or Nova Blazej, the primary person working on this project. Nova Blazej can be reached at 415-972-3846 or *blazej.nova@epa.gov*.

Sincerely,

Lisa B. Hanf, Manager
Federal Activities Office

cc: Jerome Wiggins, FTA

II. State Agencies

Department of Toxic Substances Control

Edwin F. Lowry, Director
1001 "I" Street, 25th Floor
P.O. Box 806
Sacramento, California 95812-0806

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

Gray Davis
Governor

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October 9, 2002

Joan Kugler
FTA, City of S.F. Caltrain, and SFRA
1660 Mission Street, Fifth Floor
San Francisco, California 94103

Re: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

The Department of Toxic Substances Control (DTSC) is in receipt of the environmental document identified above. Based on a preliminary review of this document, we have determined that additional review by our regional office will be required to fully assess any potential hazardous waste related impacts from the proposed project. The regional office and contact person listed below will be responsible for the review of this document in DTSC's role as a Responsible Agency under the California Environmental Quality Act (CEQA) and for providing any necessary comments to your office:

Barbara Cook
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

If you have any questions concerning DTSC's involvement in the review of this environmental document, please contact the regional office contact person identified above.

Sincerely,

Guenther W. Moskat

Guenther W. Moskat, Chief
Planning and Environmental Analysis Section

cc: Barbara Cook
Site Mitigation Branch
700 Heinz Avenue, Suite 200
Berkeley, California 94710

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at www.dtsc.ca.gov.

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December 20, 2002

SF-80-5.56
File #SF080094
SCH #95063004

Mr. Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

Transbay Terminal / Caltrain Downtown Extension/Redevelopment Project -
Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above-referenced project. We have reviewed the Draft Environmental Impact Report for construction of a multi-modal Terminal on the site of the present Transbay Transit Terminal, and have the following comments to offer:

1. Seismic Condition

As the owner/operator of the Transbay Transit Terminal, the Department has participated in ongoing regional discussion regarding relinquishment of the Terminal to a Joint Powers Authority (JPA) for replacement. The Department determined that until the facility was transferred to the JPA, the Department would need to evaluate seismic risk and acceptability levels. After an evaluation by the Department's consultant, the Office of the State Architect (OSA), the Department entered into and completed various interim seismic upgrade projects from 1993 to 1999 to mitigate the most extreme seismic risks.

Between 1993 and 1999, OSA completed three seismic retrofit projects, costing approximately $15 million. Prior to commencement of any of the seismic upgrade work the building was classified approximately at risk Level V. After completion of the final phase of the seismic upgrade work, the risk level was reduced to between Level III and Level II.

2. Terminal Deficiencies

Because regional consensus pointed to the Terminal's demolition and replacement, the Department and the Metropolitan Transportation Commission (MTC) recommended that major construction deficiencies be deferred, except on a case-by-case situation. Some of the projects recently undertaken are the completed ventilation project in the West Garage, a mechanical evaluation of the elevator and escalators, and the development of a PS&E (Plans, Specifications & Cost Estimates) to remedy an Americans with Disabilities Act (ADA)-deficient restroom and drinking fountain in the center unit.

Some of the remaining major deficiencies at the Terminal include the fire sprinkler systems; the lack of ADA-accessible bus platforms and exit routes; plumbing and electrical service to meet the Uniform Building Code (UBC); and a list of general renovation work that would need to be completed if the existing Terminal were to

be designated for full service.

3. Cultural Resources

Page 1-28 (table 1.2-4) should be revised to include the required legislative approval under California Public Resources Code Section 5027 (see additional information below).

Page 2-47 (section 2.3.1.1) describes one of the alternatives, "Renovation of Existing Transbay Terminal and Associated Structures," which was considered but withdrawn. This alternative precludes underground rail, but instead would require construction of elevated rail structures for Caltrain or high-speed rail access. According to the DEIR, this alternative was withdrawn because the anticipated seismic strengthening would preclude the project goal of revenue-generating development. The fact that the Transbay Transit Terminal and the ramps are National Register-listed properties calls for a more substantive discussion regarding the possibility of preserving the properties.

Pages 4-48 through 4-60 (section 4.16.6) and pages 5-75 through 5-77 (section 5.14.3 through 5.14.3.4), and Section 8: the DEIR text throughout these sections is inconsistent regarding the National Register of Historic Places status of the Transbay Transit Terminal, and the Bay Bridge approach and bus ramps. As of 2000, the Transbay Transit Terminal and the ramps have been "listed" on the National Register, as contributors to the San Francisco-Oakland Bay Bridge, and are no longer considered to be merely "eligible" for the National Register. Tables 4.16-1, 5.14-1, and 8.4-1 also should clarify the National Register status as listed as contributors, or 1D, rather than 2 or 2S2.

Page 5-75 (section 5.14.3.1) should address California Public Resources Code Section 5027, which states, "Any building or structure that is listed on the National Register of Historic Places and is transferred from state ownership to another public agency shall not be demolished, destroyed, or significantly altered, except for restoration to preserve or enhance its historical values, without the prior approval of the Legislature by statute. This section applies to any building or structure transferred from state ownership to another public agency after January 1, 1987."

Section 5.14.3.5 should additionally evaluate the effects of demolition of the ramps and Transbay Transit Terminal on the San Francisco-Oakland Bay Bridge.

Page 5-91 (section 5.14.3.5) discusses potential mitigation. Because the project would have effects on the San Francisco-Oakland Bay Bridge, any Historic American Buildings Survey/Historic American Engineering Record documentation on the Transbay Transit Terminal and ramps should be filed additionally with the Department. Additionally, if the Department no longer owns the Transbay Transit Terminal, the "Interpretive Display" would be the responsibility of the project proponents, not the Department. Opportunities for collaborating with the Department on the completion of mitigation tasks for effects to the San Francisco-Oakland Bay Bridge should be investigated.

4. Hazardous Materials

Section 4.17 - There is no discussion of the potential for encountering asbestos and lead during building demolition. This should be included, to be consistent with the rest of the section, which discusses potential problems during construction. The project appears to be away from veins of asbestos-bearing serpentine rock. However, if this source has not already been considered, then it would be prudent to take a closer look, particularly for the Caltrain extension.

Section 4.17.2.2 - Vehicle exhaust should also be included as a potential source of lead contamination. In areas outside the historic fill limit and industrial sites, lead contamination shows up as a surficial zone of one to two feet in depth, depending on soil type and traffic volume.

Section 5.21.9 - Asbestos should also be discussed in this section since there are Bay Area Air Quality Management District (BAAQMD) rules regarding asbestos removal and building demolition. The USEPA National Emission Standards for Hazardous Air Pollutants regulate asbestos during demolition and removal. BAAQMD has the delegated authority to enforce these regulations.

Section 5.21.11 - Does State Water Resources Control Board Order No. 99-08-DWQ apply to projects in San Francisco even though storm water runoff goes to the combined sewer system? If so, a Storm Water Pollution Prevention Plan would need to be prepared for the project. Will the project depend solely on the combined system as its sediment control practice? If not, some of the management practices listed in the Air Quality section would also minimize sediment removal from the site. Secondary containment and spill contingency should also be addressed for fuels and other liquid pollutants that will be used during construction.

5. Air Quality

Page 4-29 and 5-53: The TIP information should be updated to reflect the latest TIP/RTP information.

Page 5-52, Section 5.7.2.2: In view of the fact that there is an existing carbon monoxide (CO) exceedence shown at First and Howard Streets, the CO microscale study must address the construction year CO levels as well as the year 2020. Higher emission levels in the build year would result in higher CO levels. As it stands now, the document does not clearly show that the project does not worsen an existing exceedence.

Page 5-54: The reasoning regarding the PM-10 impacts of the project, while acceptable for the regional impacts, needs further analysis regarding microscale PM-10 impacts. Localized PM-10 impacts could be caused by a larger number of vehicles drawn to the facility, even though regional trips have been reduced. The Federal Register states that PM-10 methodology is not yet available for microscale PM-10 calculations. Some other qualitative reasoning for microscale impacts would be appropriate.

6. Right of Way (ROW)

Page S-8, and Figure S-2, discussing various development levels, should mention the fact that these parcels are currently State-owned, and that the transfer of ownership is the subject of ongoing negotiations with the State, and the subject of a cooperative agreement. Additionally, approximately 1/3 of the Block #3737 will be permanently occupied by the Folsom Street leg of the Fremont Street off-ramp. This is repeated in various figures throughout Chapter 5.

7. Proposed Bus Storage

In Chapter 2, Figure 2.2-5, the feasibility of providing a parking double-deck under the I-80 structure is not clear.

The impacts of the proposed bus storage under Interstate 80 (I-80) between Stillman, Perry, 2nd and 4th Streets are not adequately addressed in the DEIR. The West Ramp Alternative displaces AC Transit and Golden Gate Transit bus storage from current locations on the Terminal East Loop and the surface lot at Main, Beale, Folsom and Howard Streets, respectively. The Project includes a direct ramp connection between the proposed storage facilities and the new Terminal. The Noise and Vibration portions, as well as the Air Quality portions of Table S-1 do not address the impacts of the proposed bus parking underneath the I-80 structure on the residences and businesses on Stillman and Perry Streets.

Storage of 200+ buses between 2nd and 4th Streets, plus a two-level automobile parking structure at 4th Street, could represent a substantial change from the existing use that would require an Air Quality Assessment from

the Regional Air Quality Board and/or Association of Bay Area Governments (ABAG) addressing the impacts of the proposed use on air quality based on the Bay Area Air Quality Assessment Model.

Also, Streets and Highways Code Section 146 "Use of Airspace for Mass Transit" requires that the Department exercise discretion in allowing only such uses that conform to established safety design standards, and are consistent with good ecological and environmental planning. Any commitment we make to the Transbay Joint Powers Authority to provide airspace for the proposed use would be subject to the Air Quality Assessment, and our approval of the parking structure development plans.

8. Related Projects

Chapter 1, Section 1.4, titled "OTHER RELATED PROJECTS," does not mention the upcoming San Francisco-Oakland Bay Bridge (SFOBB) West Approach Seismic Safety Project, a 5-year, $225 million project, which will be impacted by the proposed Transbay Transit Terminal project. Of specific concern is the impact of the Caltrain Extension's construction activities directly underneath the West Approach structure with its new pile foundation system.

Chapter 5, Section 5.21.1.1: The second paragraph should address the impacts on the staging of the SFOBB West Approach Seismic Safety Project, the Department's intention to build a temporary on-ramp during the first stage of the project to accommodate bus access to the east loop, and the Department's commitment to retrofitting the east loop of the existing Transbay Transit Terminal. The geometric and structural feasibility of this proposal is also questionable.

9. Ramps

Chapter 2, Sections 2.2.1.1 and 2.2.1.2, the feasibility of providing the bus ramp from the existing east loop ramp down to the new temporary terminal is not clear, since no profiles are shown. Additionally, the structural feasibility of "scabbing" the proposed temporary ramp to the existing east loop ramp is not discussed.

Chapter 2, Figure 2.2-6: Again, due to a lack of profiles, the spatial arrangement of how some of these structures would operate is not clear. For example, it appears that the Department's SFOBB Electrical Substation that supplies power to the entire Bridge and its Communications Center would be impacted by one of these ramps.

10. Parking

Chapter 2, Section 3.3, page 3-36, paragraph 2: The Department does not manage parking lots. State-owned lots are leased to private vendors, usually through short-term leases.

11. Traffic Operations

Page 2-12 and figure 2.2-6: "Access to this bus storage area would be via Third Street and a two-way "storage link" ramp that would connect with the Bay Bridge-Transbay Terminal bus ramps." We assume that this "storage link" will be a bus-ONLY facility that does NOT require buses to merge with auto traffic exiting the Bay Bridge on the right side Fremont off-ramp before the buses get to the terminal.

Page 3-35 (section 3.2.4): Regarding conversion of High Occupancy Vehicle (HOV) ramp operations from Sterling Street to Essex Street. It is not clear how this would benefit motorists unless the City has plans to provide useful HOV bypasses on city streets approaching the ramp that function at least as well as what currently exists at Sterling Street. Also, since Essex Street feeds a full lane onto the Bridge, it may be necessary

to reduce this to a merge with the First Street on-ramp traffic (as it was pre-Loma Prieta earthquake) if changed to HOV operation because of the necessity of keeping the lane full in order to maximize the capacity of the Bridge.

Page 3-35 (section 3.2.4): "Harrison Street would be restriped to one-way westbound from First Street to Third Street". This would have a significant impact on the operation of a number of intersections, particularly at 2nd Street/Harrison Street and 2nd Street/Bryant Street. It would also remove one of the primary directions of approach to the Essex Street on-ramp. Has this modification been considered in the reported levels of service of these intersections?

The Transbay Transit Terminal project will require much coordination between all entities involved, and we look forward to working with you on this important transportation facility. Should you require further information or have any questions regarding this letter, please call Paul Svedersky of my staff at (510) 622-1639.

Sincerely,

Timothy C. Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: Gregoria Garcia, State Clearinghouse

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
Governor

Tal Finney
Interim Director

November 19, 2002

Joan Kugler
FTA, City of S.F., Caltrain, and SFRA
1660 Mission Street, Fifth Floor
San Francisco, CA 94103

Subject: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project
SCH#: 1995063004

Dear Joan Kugler:

The State Clearinghouse submitted the above named Joint Document to selected state agencies for review. The review period closed on November 18, 2002, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
(916)445-0613 FAX(916)323-3018 www.opr.ca.gov

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Document Details Report
State Clearinghouse Data Base

SCH# 1995063004
Project Title Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project
Lead Agency Peninsula Corridor Joint Powers Board

Type JD Joint Document

Description The proposed project has three major components: the construction of a multi-modal Terminal on the site of the present Terminal (that would be demolished) at Mission and First Streets; an underground extension of Caltrain commuter rail service from its current San Francisco terminus at Fourth and Townsend Streets to a new terminus underneath the proposed new Transbay Terminal; and establishment of a Redevelopment Area Plan with related development projects, including transit-oriented development in the vicinity of the new multi-modal Transbay Terminal. The proposed Redevelopment Area would generally be bound by Mission, Main, Spear, Folsom, Essex, I-80, Second and Minna Streets. Other subordinate components of the project include a temporary bus terminal facility at Beale and Folsom Streets to be used during construction of the new Transbay Terminal; a new, permanent off-site bus storage/layover facility; reconstructed bus ramps leading to the new Transbay Terminal; and a redesigned Caltrain storage yard.

Lead Agency Contact

Name Joan Kugler
Agency FTA, City of S.F., Caltrain, and SFRA
Phone 415-558-5983 **Fax**
email
Address 1660 Mission Street, Fifth Floor
City San Francisco **State** CA **Zip** 94103

Project Location

County San Francisco
City San Francisco
Region
Cross Streets Mission, Main, Spear, Folsom, Essex, Harrison, Second
Parcel No. Multiple
Township **Range** **Section** **Base**

Proximity to:

Highways U.S. 101,I-280,I-80
Airports
Railways SF Muni,Caltrain, and BART
Waterways San Francisco Bay
Schools
Land Use Mix of light industrial, warehousing/distribution, commercial office, retail, live-work, and residential uses and surface parking lots. Currently zoned P (Public), C-3-S (Downtown Support District), C-3-0 (Downtown Office District), and S-3-0 (SD) (Downtown Office District: Special District). General Plan and its elements, including the Downtown Plan, the South of Market Plan, and the Rincon Hill Area Plan.

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Geologic/Seismic; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American

Note: Blanks in data fields result from insufficient information provided by lead agency.

Heritage Commission; Public Utilities Commission; State Lands Commission

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Date Received 10/04/2002 ***Start of Review*** 10/04/2002 ***End of Review*** 11/18/2002

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse

Gray Davis
Governor

Tal Finney
Interim Director

December 23, 2002

Joan Kugler
FTA, City of S.F., Caltrain, and SFRA
1660 Mission Street, Fifth Floor
San Francisco, CA 94103

Subject: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project
SCH#: 1995063004

Dear Joan Kugler:

The enclosed comment (s) on your Joint Document was (were) received by the State Clearinghouse after the end of the state review period, which closed on November 18, 2002. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (1995063004) when contacting this office.

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
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STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, Governor

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SF-80-5.56
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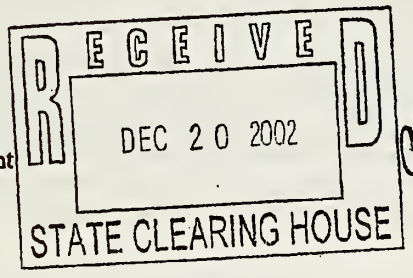

Mr. Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

Transbay Terminal / Caltrain Downtown Extension/Redevelopment Project - Draft Environmental Impact Report (DEIR)

Thank you for including the California Department of Transportation (Department) in the environmental review process for the above-referenced project. We have reviewed the Draft Environmental Impact Report for construction of a multi-modal Terminal on the site of the present Transbay Transit Terminal, and have the following comments to offer:

1. Seismic Condition

As the owner/operator of the Transbay Transit Terminal, the Department has participated in ongoing regional discussion regarding relinquishment of the Terminal to a Joint Powers Authority (JPA) for replacement. The Department determined that until the facility was transferred to the JPA, the Department would need to evaluate seismic risk and acceptability levels. After an evaluation by the Department's consultant, the Office of the State Architect (OSA), the Department entered into and completed various interim seismic upgrade projects from 1993 to 1999 to mitigate the most extreme seismic risks.

Between 1993 and 1999, OSA completed three seismic retrofit projects, costing approximately $15 million. Prior to commencement of any of the seismic upgrade work the building was classified approximately at risk Level V. After completion of the final phase of the seismic upgrade work, the risk level was reduced to between Level III and Level II.

2. Terminal Deficiencies

Because regional consensus pointed to the Terminal's demolition and replacement, the Department and the Metropolitan Transportation Commission (MTC) recommended that major construction deficiencies be deferred, except on a case-by-case situation. Some of the projects recently undertaken are the completed ventilation project in the West Garage, a mechanical evaluation of the elevator and escalators, and the development of a PS&E (Plans, Specifications & Cost Estimates) to remedy an Americans with Disabilities Act (ADA)-deficient restroom and drinking fountain in the center unit.

Some of the remaining major deficiencies at the Terminal include the fire sprinkler systems; the lack of ADA-accessible bus platforms and exit routes; plumbing and electrical service to meet the Uniform Building Code (UBC); and a list of general renovation work that would need to be completed if the existing Terminal were to

be designated for full service.

3. Cultural Resources

Page 1-28 (table 1.2-4) should be revised to include the required legislative approval under California Public Resources Code Section 5027 (see additional information below).

Page 2-47 (section 2.3.1.1) describes one of the alternatives, "Renovation of Existing Transbay Terminal and Associated Structures," which was considered but withdrawn. This alternative precludes underground rail, but instead would require construction of elevated rail structures for Caltrain or high-speed rail access. According to the DEIR, this alternative was withdrawn because the anticipated seismic strengthening would preclude the project goal of revenue-generating development. The fact that the Transbay Transit Terminal and the ramps are National Register-listed properties calls for a more substantive discussion regarding the possibility of preserving the properties.

Pages 4-48 through 4-60 (section 4.16.6) and pages 5-75 through 5-77 (section 5.14.3 through 5.14.3.4), and Section 8: the DEIR text throughout these sections is inconsistent regarding the National Register of Historic Places status of the Transbay Transit Terminal, and the Bay Bridge approach and bus ramps. As of 2000, the Transbay Transit Terminal and the ramps have been "listed" on the National Register, as contributors to the San Francisco-Oakland Bay Bridge, and are no longer considered to be merely "eligible" for the National Register. Tables 4.16-1, 5.14-1, and 8.4-1 also should clarify the National Register status as listed as contributors, or 1D, rather than 2 or 2S2.

Page 5-75 (section 5.14.3.1) should address California Public Resources Code Section 5027, which states, "Any building or structure that is listed on the National Register of Historic Places and is transferred from state ownership to another public agency shall not be demolished, destroyed, or significantly altered, except for restoration to preserve or enhance its historical values, without the prior approval of the Legislature by statute. This section applies to any building or structure transferred from state ownership to another public agency after January 1, 1987."

Section 5.14.3.5 should additionally evaluate the effects of demolition of the ramps and Transbay Transit Terminal on the San Francisco-Oakland Bay Bridge.

Page 5-91 (section 5.14.3.5) discusses potential mitigation. Because the project would have effects on the San Francisco-Oakland Bay Bridge, any Historic American Buildings Survey/Historic American Engineering Record documentation on the Transbay Transit Terminal and ramps should be filed additionally with the Department. Additionally, if the Department no longer owns the Transbay Transit Terminal, the "Interpretive Display" would be the responsibility of the project proponents, not the Department. Opportunities for collaborating with the Department on the completion of mitigation tasks for effects to the San Francisco-Oakland Bay Bridge should be investigated.

4. Hazardous Materials

Section 4.17 - There is no discussion of the potential for encountering asbestos and lead during building demolition. This should be included, to be consistent with the rest of the section, which discusses potential problems during construction. The project appears to be away from veins of asbestos-bearing serpentine rock. However, if this source has not already been considered, then it would be prudent to take a closer look, particularly for the Caltrain extension.

Section 4.17.2.2 - Vehicle exhaust should also be included as a potential source of lead contamination. In areas outside the historic fill limit and industrial sites, lead contamination shows up as a surficial zone of one to two feet in depth, depending on soil type and traffic volume.

Section 5.21.9 - Asbestos should also be discussed in this section since there are Bay Area Air Quality Management District (BAAQMD) rules regarding asbestos removal and building demolition. The USEPA National Emission Standards for Hazardous Air Pollutants regulate asbestos during demolition and removal. BAAQMD has the delegated authority to enforce these regulations.

Section 5.21.11 - Does State Water Resources Control Board Order No. 99-08-DWQ apply to projects in San Francisco even though storm water runoff goes to the combined sewer system? If so, a Storm Water Pollution Prevention Plan would need to be prepared for the project. Will the project depend solely on the combined system as its sediment control practice? If not, some of the management practices listed in the Air Quality section would also minimize sediment removal from the site. Secondary containment and spill contingency should also be addressed for fuels and other liquid pollutants that will be used during construction.

5. Air Quality

Page 4-29 and 5-53: The TIP information should be updated to reflect the latest TIP/RTP information.

Page 5-52, Section 5.7.2.2: In view of the fact that there is an existing carbon monoxide (CO) exceedence shown at First and Howard Streets, the CO microscale study must address the construction year CO levels as well as the year 2020. Higher emission levels in the build year would result in higher CO levels. As it stands now, the document does not clearly show that the project does not worsen an existing exceedence.

Page 5-54: The reasoning regarding the PM-10 impacts of the project, while acceptable for the regional impacts, needs further analysis regarding microscale PM-10 impacts. Localized PM-10 impacts could be caused by a larger number of vehicles drawn to the facility, even though regional trips have been reduced. The Federal Register states that PM-10 methodology is not yet available for microscale PM-10 calculations. Some other qualitative reasoning for microscale impacts would be appropriate.

6. Right of Way (ROW)

Page S-8, and Figure S-2, discussing various development levels, should mention the fact that these parcels are currently State-owned, and that the transfer of ownership is the subject of ongoing negotiations with the State, and the subject of a cooperative agreement. Additionally, approximately 1/3 of the Block #3737 will be permanently occupied by the Folsom Street leg of the Fremont Street off-ramp. This is repeated in various figures throughout Chapter 5.

7. Proposed Bus Storage

In Chapter 2, Figure 2.2-5, the feasibility of providing a parking double-deck under the I-80 structure is not clear.

The impacts of the proposed bus storage under Interstate 80 (I-80) between Stillman, Perry, 2nd and 4th Streets are not adequately addressed in the DEIR. The West Ramp Alternative displaces AC Transit and Golden Gate Transit bus storage from current locations on the Terminal East Loop and the surface lot at Main, Beale, Folsom and Howard Streets, respectively. The Project includes a direct ramp connection between the proposed storage facilities and the new Terminal. The Noise and Vibration portions, as well as the Air Quality portions of Table S-1 do not address the impacts of the proposed bus parking underneath the I-80 structure on the residences and businesses on Stillman and Perry Streets.

Storage of 200+ buses between 2nd and 4th Streets, plus a two-level automobile parking structure at 4th Street, could represent a substantial change from the existing use that would require an Air Quality Assessment from

the Regional Air Quality Board and/or Association of Bay Area Governments (ABAG) addressing the impacts of the proposed use on air quality based on the Bay Area Air Quality Assessment Model.

Also, Streets and Highways Code Section 146 "Use of Airspace for Mass Transit" requires that the Department exercise discretion in allowing only such uses that conform to established safety design standards, and are consistent with good ecological and environmental planning. Any commitment we make to the Transbay Joint Powers Authority to provide airspace for the proposed use would be subject to the Air Quality Assessment, and our approval of the parking structure development plans.

8. Related Projects

Chapter 1, Section 1.4, titled "OTHER RELATED PROJECTS," does not mention the upcoming San Francisco-Oakland Bay Bridge (SFOBB) West Approach Seismic Safety Project, a 5-year, $225 million project, which will be impacted by the proposed Transbay Transit Terminal project. Of specific concern is the impact of the Caltrain Extension's construction activities directly underneath the West Approach structure with its new pile foundation system.

Chapter 5, Section 5.21.1.1: The second paragraph should address the impacts on the staging of the SFOBB West Approach Seismic Safety Project, the Department's intention to build a temporary on-ramp during the first stage of the project to accommodate bus access to the east loop, and the Department's commitment to retrofitting the east loop of the existing Transbay Transit Terminal. The geometric and structural feasibility of this proposal is also questionable.

9. Ramps

Chapter 2, Sections 2.2.1.1 and 2.2.1.2, the feasibility of providing the bus ramp from the existing east loop ramp down to the new temporary terminal is not clear, since no profiles are shown. Additionally, the structural feasibility of "scabbing" the proposed temporary ramp to the existing east loop ramp is not discussed.

Chapter 2, Figure 2.2-6: Again, due to a lack of profiles, the spatial arrangement of how some of these structures would operate is not clear. For example, it appears that the Department's SFOBB Electrical Substation that supplies power to the entire Bridge and its Communications Center would be impacted by one of these ramps.

10. Parking

Chapter 2, Section 3.3, page 3-36, paragraph 2: The Department does not manage parking lots. State-owned lots are leased to private vendors, usually through short-term leases.

11. Traffic Operations

Page 2-12 and figure 2.2-6: "Access to this bus storage area would be via Third Street and a two-way "storage link" ramp that would connect with the Bay Bridge-Transbay Terminal bus ramps." We assume that this "storage link" will be a bus-ONLY facility that does NOT require buses to merge with auto traffic exiting the Bay Bridge on the right side Fremont off-ramp before the buses get to the terminal.

Page 3-35 (section 3.2.4): Regarding conversion of High Occupancy Vehicle (HOV) ramp operations from Sterling Street to Essex Street. It is not clear how this would benefit motorists unless the City has plans to provide useful HOV bypasses on city streets approaching the ramp that function at least as well as what currently exists at Sterling Street. Also, since Essex Street feeds a full lane onto the Bridge, it may be necessary

to reduce this to a merge with the First Street on-ramp traffic (as it was pre-Loma Prieta earthquake) if changed to HOV operation because of the necessity of keeping the lane full in order to maximize the capacity of the Bridge.

Page 3-35 (section 3.2.4): "Harrison Street would be restriped to one-way westbound from First Street to Third Street". This would have a significant impact on the operation of a number of intersections, particularly at 2nd Street/Harrison Street and 2nd Street/Bryant Street. It would also remove one of the primary directions of approach to the Essex Street on-ramp. Has this modification been considered in the reported levels of service of these intersections?

The Transbay Transit Terminal project will require much coordination between all entities involved, and we look forward to working with you on this important transportation facility. Should you require further information or have any questions regarding this letter, please call Paul Svedersky of my staff at (510) 622-1639.

Sincerely,

Timothy C Sable

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA

c: Gregoria Garcia, State Clearinghouse

III. Regional Agencies

BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

ALAMEDA COUNTY
Roberta Cooper
Scott Haggerty
(Vice-Chairperson)
Nate Miley
Shelia Young

CONTRA COSTA COUNTY
Mark DeSaulnier
Mark Ross
Gayle Uilkema

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Brad Wagenknecht

SAN FRANCISCO COUNTY
Chris Daly
Leland Yee
(Vacant)

SAN MATEO COUNTY
Jerry Hill
Mariand Townsend
(Secretary)

SANTA CLARA COUNTY
Randy Attaway
(Chairperson)
Liz Kniss
Julia Miller
Dena Mossar

SOLANO COUNTY
John F. Silva

SONOMA COUNTY
Tim Smith
Pamela Torliatt

William C. Norton
EXECUTIVE OFFICER/APCO

November 21, 2002

Paul Maltzer, Environmental Review Officer
San Francisco, Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Subject: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project
Draft Environmental Impact Report (DEIR)

Dear Mr. Maltzer:

The Bay Area Air Quality Management District (District) has reviewed your agency's DEIR for the Transbay Terminal Project. The project would replace the existing outdated terminal with a new multi-modal transit facility. The proposed project's Caltrain extension to the terminal, improved bus service, and transit-oriented redevelopment of the surrounding area will help to improve regional transit and thereby reduce air pollution. However, we have some concerns about the localized exposure of transit riders at the Terminal to diesel particulate emissions from buses serving the terminal. We also believe that the DEIR does not adequately address pedestrian and bicycle access between the Terminal and nearby destinations.

The Terminal alternatives are unique in the Bay Area because they would place a high concentration of diesel buses and their emissions in close proximity to a large number of people on a daily basis. Diesel particulate emissions have been designated by the California Air Resources Board as a Toxic Air Contaminant (TAC) and are a suspected carcinogen. To determine whether the proposed project or its alternatives would result in a significant air quality impact, we are requesting that the Final EIR evaluate the exposure of transit riders at the Terminal to diesel particulate emissions from buses. The analysis should consider the daily volume and emission characteristics of the bus fleet accessing the Terminal and the proximity of buses to transit riders. The Air District's CEQA Guidelines threshold for a significant air quality impact is breached when the probability of contracting cancer for the Maximally Exposed Individual exceeds 10 in one million. If your evaluation of the proposed project or its alternatives results in a significant air quality impact, we request that the impact be mitigated. Mitigation from exposure to diesel particulate might include measures to reduce emissions such as establishing maximum bus idling times, use of cleaner burning fuels, retrofitting bus fleets and use of low emission buses. Mitigation measures to reduce exposure of transit riders to diesel particulate emissions might include ventilation of bus exhaust and separation of buses from transit riders through building design or operations.

We believe that if the Terminal is to function optimally as a multi-modal facility then the design of the building and the surrounding redeveloped area must improve access

to pedestrians and bicyclists. The DEIR indicates that the future project scenarios would significantly increase the number of pedestrians on sidewalks and at intersections in the vicinity of the Terminal and result in a significant impact. The measures in the DEIR to improve pedestrian access appear insufficient to mitigate the impacts to less than significant. We request that the FEIR consider improving pedestrian access by expanding the sidewalks and narrowing street widths in the vicinity of the Terminal. The DEIR also indicates that future project scenarios would result in an almost ten-fold increase in bicyclists in the vicinity of the Terminal. To integrate bicycling with the multi-modal Terminal, we recommend that the Project link planned bicycle routes along Howard and Second Streets with the Terminal. Once inside the Terminal, bicyclists should be able to easily connect with buses and trains or have the option of on-site storage, such as a bike station.

If you have any questions regarding these comments, please contact Joseph Steinberger, Senior Environmental Planner, at (415) 749-5018.

Sincerely,

William C. Norton
Executive Officer/APCO

WN:JS

cc: BAAQMD Director Chris Daly
BAAQMD Director Leland Yee

IV. Local Agencies

MEMORANDUM

Date: December 18, 2002

To: Joan Kugler
Planning Department

Through: Bond Yee, Deputy Director and City Traffic Engineer

From: Jack Fleck, Senior Transportation Engineer
Jerry Robbins, Transit Planner V

Subject: Transbay Terminal EIR

These are our comments on the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Draft EIS/EIR/Section 4(f) Evaluation dated October, 2002 (the Report).

Level of Service Comments

For the most part, the transit operations which this project serves will operate on grade separated facilities—AC Transit on ramps and Caltrain underground. Therefore, the traffic impacts from the Terminal itself should not be too significant. SamTrans, Golden Gate Transit, and Muni operate on surface routes, so they will be affected by traffic generated from the redevelopment project. With regard to these new developments, the City policy of not building large parking garages with new buildings should help prevent these buildings from generating large volumes of traffic. In fact, considering that most of the land to be developed is currently occupied by parking lots, the total net increase in traffic generation should be minor. Therefore, we have a question about the sentence on page 5-125, which states, "The Terminal/Extension Project would result in a substantial increase in vehicle trips to and from new developments. . ." How was this calculated?

Table 3.2-1 on page 3-34 does show numerous intersections operating at traffic LOS F, particularly on 1st Street. This congestion is due to queuing for the Bay Bridge in the PM peak. In fact the actual conditions are somewhat worse than shown on this table. Our observations show that traffic backs up on 1st Street at least to Market Street about half the time during the PM commute periods. This percentage has fluctuated since the 1989 Loma Prieta earthquake from about 30% to 70% depending on various factors including the state of the economy. This queuing condition is not likely to change, but it could get worse, e.g. the back-up could be every night. The City deploys Parking Control Officers to keep intersections open, and we have re-routed buses to help them avoid getting stuck in the queue.

On page 5-124 the report lists 7 intersections as having adverse impacts due to the project. An additional six intersections are listed on page 5-125 as having adverse impacts under cumulative conditions. Of these 13 adversely impacted intersections, 11 are part of the Bay Bridge queue. We agree with the suggestion on page 5-126 that funding for the SFgo program could be a useful mitigation effort. The SFgo program will provide improved traveler information so that drivers will be aware of the queuing and possibly change plans to adjust to it, prior to starting their trip. In addition, SFgo will have traffic monitoring cameras that can be used to dispatch parking control officers in a timely fashion when the queue begins to form.

The other two intersections with adverse affects—Beale/Howard and Fremont/Howard are not part of the queue. Therefore, we would like to see mitigations to improve operations here. It appears that the intersections along Fremont Street were only looked at in the PM peak hour. This street is more congested in the AM peak than the PM peak due to the Fremont Street off-ramp from the Bay Bridge, so the report probably is not looking at the worst case impacts.

It is not clear that the LOS calculations account for increased pedestrian volumes at intersections like First/Mission and Fremont/Mission. These intersections used to be much more congested in the pre-BART era when there were more pedestrians going to and from the TBT at peak hours. Does the report include the impact of increased ped crossings?

Additional comments

Muni impacts – Assuming that the new developments do not build large parking lots, most trips to and from them will be by transit. Will there be a transit impact fee and is the fee adequate to offset service costs to Muni for the additional service required?

Casual carpools - Page 3-43 – The evening casual carpool queues have been affected by the closing of Beale Street under the Bay Bridge for security purposes. I'm not sure that the description in this section is accurate any more.

Bicycles - Page 3-49– DPT is proposing to add bike lanes on Howard Street from Fremont Street to 5th Street. Bike lanes are already installed on Howard from 5th to 11th.

Page 5-138 – The plan for 105 bike storage spaces is good, but there should be a provision for additional space if needed. We do expect large increases in bike riders as bicycle facilities continue to improve in San Francicso.

Size of the terminal - Page 5-111 – "The new terminal will accommodate 35,000 rail and bus passengers during the peak hour. This is 11,000 more passengers than the 24,000 passengers projected for peak hour demand in 2020. The current peak hour passenger flow at the existing Terminal is 10,000 passengers." This raises a concern about overbuilding. Currently the Transbay Terminal is larger than it needs to be. If the new terminal is even larger, there will be a lot of empty space. Could some of that space be

used for storage of buses? Are there interim/back-up plans in case the large ridership projections do not materialize?

Caltrain - Figure 2.2-11/12 – Currently Caltrain uses Townsend Street for moving its trains during the day. This impacts the City's use of the street for bikes/parking/ sidewalks/etc. Will this use of Townsend be discontinued with the new Caltrain alignment. If so, this is a positive impact.

If you have any questions about this report, or need further information, please contact me at 554-2344 or at jack_fleck@ci.sf.ca.us

San Francisco County Transportation Authority

100 Van Ness Avenue 25TH Floor
San Francisco, California 94102
415.522.4800 FAX 415.522.4829
info@sfcta.org www.sfcta.org

December 19, 2002

RECEIVED
DEC 26 2002
PLANNING DEPT

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste 500
San Francisco, CA 94103

Subject: Comments on the Draft Environmental Impact Report/Statement and Section 4f Evaluation for the Transbay Terminal/Caltrain Downtown Extension Project

Dear Mr. Maltzer: Paul

Thank you for the opportunity to comment on the subject DEIR/DEIS. As it is well known, the Authority has been a steadfast supporter of the project, and it played a key role in the negotiations leading to the inclusion of the Transbay Terminal/Caltrain Downtown Extension in the Regional Transit Expansion Policy (Resolution 3434) adopted last March by the Metropolitan Transportation Commission as part of the 2001 Regional Transportation Plan (RTP). The Authority is the sponsoring agency for the project in the RTP and, as such, it has been required over the past year to submit capital and operating plans.

Our main focus, therefore, in performing a review of the DEIR/DEIS, were the sections relating to costs, schedule and funding. Given the less than bright prospects for transportation funding at the state level, we tried to identify any areas where additional opportunities for cost reduction may be found. The Authority's on-call engineering services consultant, Cordoba/Zurinaga assisted us with many of the technical aspects of the review.

With the recent developments in the State Budget, which now registers a $35 billion deficit, it has become clear that there will be schedule and funding impacts to transportation projects across California. In particular, there will be significant impacts to state sales tax-dependent sources like Prop 42, and the Governor's Traffic Congestion Relief Program (TCRP) which are tied to the General Fund. The cash problems in the State Highway Account, which date back some years now, will be further exacerbated. The Governor has already proposed nearly $2 billion in transportation program cuts, and the State Department of Transportation is even considering reneging on allocations already made by the California Transportation Commission. The schedule for this project will inevitable have to be re-examined in light of these troubling developments, as will be the case for all projects included in the 2001 RTP.

While the Authority Board has not taken a position yet, I will be proposing a strategy that advocates keeping San Francisco's key projects moving. This is indispensable if we are to compete well for funding at the federal level in this critical year of the reauthorization of TEA 21, and it is essential if we are to be ready to build these needed projects once the economy rebounds. Such a strategy will only work if we propose realistic schedules, which are scaled down to our ability to cash flow projects. A central element of that strategy will be the reauthorization of the local sales tax for transportation. The Authority is ready and eager to work with the City and County of San Francisco to ensure that such a strategy can be developed in the next few months.

Moving the City.

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Regarding the funding assumptions in Chapter 6 (Section 6.6.3 on page 6-10), while they are generally consistent with the Authority's initial funding plan submitted to MTC, we note that Prop 42 revenues are not likely to materialize until well after 2008 (as originally anticipated) and that once they become available they will need to be prioritized by the Authority Board. It cannot be automatically assumed that all Prop 42 funds would go to a single project. The DEIR/DEIS should note in Table 6.6-1 and in Section 6.6.3 the need for an Authority policy action regarding these funds. We anticipate that the Countywide Transportation Plan, currently being prepared by the Authority will include recommendations for the use of Prop 42, as well as a specific funding amount proposed for this project out of the reauthorization of the sales tax.

As mentioned above, we comment and pose questions in the areas of Value Engineering, Construction Phasing, Delivery Schedule, and Constructability with the aim of encouraging further exploration of cost reduction opportunities. We also provide specific comments about the proposed schedule. Our comments are as follows:

1) Since the Terminal is in the same location as the existing terminal and has practically the same footprint, was consideration given to using even a portion of the existing ramps? The southern ramp could be modified to provide access to the temporary terminal. Elevation differentials, if any, could be resolved relatively easily at this stage of design.

2) The cost summary for the Terminal, pages S-24 and 2-21, begs a few questions:

   - The cost estimate needs to resolve some inconsistencies and include sufficient backup information to raise the level of comfort about its accuracy.

   - The percentage allowed for soft costs, including design, insurance, mitigation and escalation is only 27% of construction costs. It is not clear whether the allowances for CM/Management, construction contingency, and management reserve are included in that percentage, since they do not appear to be accounted for elsewhere in the document. Percentage of soft costs varies from as low as 22.4% for Permanent Ramps to 53% for Bus Storage.

   - Escalation is only to start of construction; industry practice is to escalate to mid-point of construction. Although it is possible that escalation may not be a major factor due to the early stages of project development and foreseen economic climate, and thus be absorbed by contingency reserves, the budget should address this, especially in light of the latest developments at the state level.

   - At $22 M, the cost of the temporary terminal facility appears relatively high. This boils down to approximately $330/square foot, for what is essentially an at-grade parking lot with minimal amenities, in a lot that is already graded, paved, and in use as a bus storage facility.

   - The cost for the temporary ramp is the same for both options even though the drawings on pages S-5 and S-6 show the temporary ramp to be much shorter for the Loop Ramp alternative. Is some of the cost of the temporary ramp for the West Ramp option being offset by the new off-ramp to be built by Caltrans?

   - The estimate shows the Loop Ramp alternative to cost more than double ($315.8M vs. $153M) the West Ramp cost, even though the West Ramp option is double-decked and the Loop Ramp alternative is single-decked (including the West Ramp portion). Can the new Loop Ramp be combined with the new Caltrans off ramp to offset some of the costs for the Loop?

   - The West Loop is described as having six levels, with four above ground, the Loop Ramp alternative is described as five levels, with three above ground, but the cost of both options is

exactly the same. On page 2-17, figure 2.2-7 shows an elbow on the East end of the terminal (which presumably accounts for the cost differential between five and six levels), but the description of the option does not mention it or explain why this portion is necessary.

3) Page 2-11 shows the layout of the two top floors but not the other two above-ground floors or the two below ground. There is no drawing depicting the full footprint of the facility, showing the envisioned floor-by-floor space utilization plan.

4) Table S-1, on page S-17 indicates that the West Ramp alternative will accommodate an additional 35,000 passengers by providing 34 bus bays, but the Loop Ramp alternative will accommodate only 24,000 passengers by providing 51 bus bays, 17 bays more than West Loop. This statement needs clarification.

5) The description of the Terminal (page 2-9) mentions that 150,000 to 225,000 square foot of space will be provided on the Concourse Level for retail, entertainment, conference, educational, and cultural uses, but does not provide a conceptual breakdown between the various uses, or describe what types of tenants are envisioned overall (i.e.: supermarket, theaters, bookstores, video rental, restaurants, coffee houses, etc.). The description does not mention retail, entertainment, or other concession space on the other floors. Since retail and entertainment leases are tried-and-true revenue generators, space for these purposes should be maximized throughout the facility.

6) Once the facility is completed, and with the inclusion of high-speed rail service, the terminal will serve significantly more long-distance and non-commuter passengers. Although most passengers will take advantage of the multiple transit connections available at the site and others will walk, it is expected that a portion of them will be served by private transportation. It is not clear from the information offered what provisions are contemplated, if any, for bicycles, taxi stands, or private vehicle pick-up and drop-off areas, as well as short-term waiting areas (The entry-level drawing on page 2-10 only shows buses). Is it to be understood that private vehicles picking up passengers are going to wait in a holding pattern driving around the terminal? If so, what provisions are being made to handle the traffic?

7) It appears that the design of the Terminal does not provide for the future development of a Muni Metro station. Since the current plan for the Geary Corridor calls for a station at the Transbay Terminal, the design should accommodate its inclusion, or at least not foreclose on its future development.

8) On page 5-94 the design concept shows a very attractive but complicated roofline. Considering that tall buildings will surround the terminal, and that as a result the perspective view of the building as shown on Figure 5-16.1 is not probable, has consideration been given to a more easily constructible (and therefore less expensive) roof that provides some of the same functionality? Furthermore, has the potential for additional development above the terminal itself, for retail or other uses, been seriously considered?

9) Also on page 5-94, the bottom drawing shows what appear to be cars and other vehicles in two underground levels adjacent and to the left of the Caltrain station with a large (approx. 170 feet) three-level atrium space above it. There is no mention of this space in the project description, although apparently it is also shown on the plan on page 2-10. Is it part of the Terminal or is it a representation of the adjoining private sector development envisioned for that space?

10) On page 2-37, the description of the Caltrain tunneling option states, "...tunneling appears to be feasible only for that portion of the alignments between Townsend Street and Folsom Boulevard". The section between Folsom and the Terminal, as well as the tail tracks out to Main Street can also be tunneled if soil stabilization methods such as grouting are used for the sand and mud sections.

The Muni Metro Turnback project demonstrated that tunneling could be performed successfully in unstable soils next to the bay. The advantages of tunneling are many:

- Reduced utility conflicts, and reduced likelihood of disruption to services (see page 5-152, first paragraph)
- Minimized disruption to businesses and the general public (see impacts of cut-and-cover on neighborhoods and businesses on page S-20)
- Reduced noise levels
- Minimized need for street closures
- Minimized need for street reconstruction
- Reduced amount of haul-truck trips and associated traffic congestion, dust, and mud by significantly reducing the amount of excavation and backfill (see page 5-167)
- Reduced number of buildings that have to be purchased for demolition purposes only

Given the potential benefits of tunneling, including the possibility of cost reductions, maximizing its use should be considered further.

11) The Cost Estimate for the Caltrain Extension is only escalated to the start of construction; industry practice is to escalate to mid-point of construction. Although it appears that there are sufficient contingency funds to absorb moderate escalation, the budget should be adjusted to reflect realistic escalation forecasts.

12) On page 5-139, the discussion of Final Design and Development of Construction Contracts, states that: "Final Design would in turn lead to determinations of construction contract packaging". Development of a Contracting Plan, with its two major components the Contracting Strategy and Contract Packaging Plan, is a task that needs to be performed before Final Design, not during or after, especially for a project of this magnitude. The Contract Packaging Plan should clearly delineate how and why the project is going to be broken down in different contracts, and the Contracting Strategy must address the delivery methods (i.e.: Design-Bid-Build, CM at-Risk, Design-Build, Fabricate-Install, Owner Supplied, etc.) for each contract. Since these documents influence Final Design, they should be developed no later than during Schematic Design for the Extension and Design Development for the Terminal, earlier if at all possible. It is invaluable to go into Final Design with the road map that a properly developed Contracting Plan provides, with full knowledge of how the design is going to be broken down into contract packages, and how they are going to be delivered; not doing so almost invariably results in expensive and time-consuming re-packaging.

13) The Construction Phasing shown on page 5-161 appears at first glance to be overly optimistic:

- The schedule indicates that construction will commence in July 2004 on the Terminal and January 2004 on the Caltrain extension, 19 months and 13 months hence, respectively. The construction of the temporary terminal and ramps is scheduled to commence 10 months from now. Considering that the DEIR/DEIS is in the review phase and design is in the conceptual stages, it is difficult to envision consultant selection, design development, final design, and contractor selection to be completed within that time frame. In addition, Real Estate acquisition would have to take place within the same time frame for construction to commence on January 2004. A reasonable duration for this work would be a minimum of two years (probably closer to three), provided a very aggressive and competent management team fast tracks the project.
- The schedule assumes that Caltrans will complete the new Fremont Street off-ramp in time for the temporary ramp to be constructed in the third quarter of 2003, which with information

currently available, appears unlikely. In addition, there appear to be conflicts between the construction of the new Fremont ramp and the existing AC Transit ramp.

- The schedule provides for 36 months to construct the cut-and-cover section of the Caltrain Extension (same duration for tunnel alternative). This provides for an average production rate of approximately eight feet per day, which translates to a peak rate of sixteen feet per day for about 10 months of peak construction. Considering the section of the subway (some cuts are 100 feet deep, which have to be backfilled and compacted after the subway is constructed), construction methods, and location, the production rate, although achievable, is aggressive and requires for everything to go exactly according to plan, which is seldom the case in underground projects. In contrast the retained cut section, which is significantly easier (inside the existing yard, significantly less excavation, no street closures), is planned for the same production rate.

- The schedule provides for 39 months for demolition of the existing terminal and construction of the new terminal and permanent ramps. Based on cost, this schedule represents an average construction expenditure of approximately a million dollars per workday, peaking at two million dollars per day during the 11-month (approximate) peak construction period. In addition, demolition of the old terminal will be time-consuming due to the necessary asbestos abatement. The schedule although achievable, is unlikely and appears aggressive considering the site constraints.

- The aggressiveness of the schedule is in conflict with the availability of funds, even before considering the latest grim news from the state. The project would benefit from a more realistic schedule, where projected cash draw-downs are more in tune with the financial plan.

Without the basis for the summary schedule provided in the document, it is difficult to fully assess its reliability. We stand ready to take a close second look as soon as a detailed schedule is provided to us.

15) On page 6-8 of the Financial Analysis, Table 6.6-1 has a line item for Value Engineering, which reduces the overall cost of the project by 10 percent. There is no mention of the timing of the Value Engineering efforts. In order to derive the most benefit of Value Engineering, it needs to take place now, and the budgets revised accordingly, before design proceeds any further. If design is allowed to proceed without revising the budgets, costly redesign fees will be incurred, spending funds that could otherwise be used for scope items.

The rest of the document appears to be thorough and well-researched. I would like to thank the Planning Department for its role in generating a major environmental document like this, under budget and schedule constraints. Should there be questions about the funding-related issues in this letter, please contact Maria Lombardo at 522.4802. Engineering questions will be addressed by Paul Ward, who is reachable at 522.4808.

Sincerely,

José Luis Moscovich
Executive Director

cc: Authority Commissioners
J. Kugler – DCP
M. Ayerdi - MOED
MEL, PW, FR

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V. Transit Providers Agencies

RECEIVED Date: December 20, 2002
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AC Transit
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Deputy General Manager
Service Development

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December 20, 2002

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., Suite 500
San Francisco, Ca. 94103

Re: Transbay Terminal Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) comment on the EIS/EIR for Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

Transbay Terminal is an extremely important facility for AC Transit. It is our only stop in San Francisco and serves thousands of riders daily. As the demand for travel to San Francisco grows, and other transportation modes reach capacity, we expect ridership to Transbay Terminal to increase. However the current facility is badly in need of modernization so that it can function better for both bus operations and riders. Therefore, AC Transit hopes to see a new Transbay Terminal and associated ramps constructed at the earliest possible date.

AC Transit supports the Environmentally Superior Alternative identified on Page S-27 of the EIS/EIR--the West Ramp Transbay Terminal, Second to Main, Tunneling Option, Full Build. We believe that the West Ramp alternative strikes an appropriate balance between the needs of bus circulation and the potential for redevelopment in the surrounding area. AC Transit supports redevelopment in the Terminal area as a way to generate both financing for the Terminal and ridership on our service.

We are aware that some property owners and residents in the Second St.& I-80 area have raised concerns about the bus storage planned under the freeway there. They have raised concerns about both air quality and traffic impacts. AC Transit sees this bus storage site as a critical and integral part of the project that should not be changed. By providing dedicated ramps from the bus storage site to the Terminal, AC Transit can quickly and reliably move buses from one to the other. If our buses had to operate from another storage site to the Terminal, which required the use of often congested Downtown San Francisco streets, this would substantially increase our running time and operating cost.

We also believe that the air quality and traffic concerns are misplaced. The air quality concern is based on an obsolete image of highly polluting diesel buses. Modern clean diesel buses eliminate all but a small fraction of former emissions. In addition, the buses would only be running at the storage site for a few minutes per day. The number of cars that currently use the site is larger than the projected number of buses, so that the existing cars also have air quality impacts. The bus storage facility and ramps could actually improve traffic in the area. The storage sites are currently used as parking lots for automobiles,

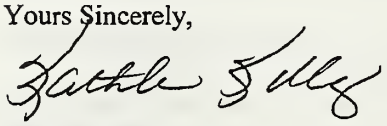
which access the lots via city streets. By creating dedicated ramps and removing on street trips, traffic congestion could actually ease.

In reviewing the draft EIS/EIR, the Planning Committee of AC Transit's Board of Directors raised some concerns. One concern was that the Purpose and Need statement contained on page S-1 did not make any mention of improvements for passengers. We propose that the following language be added to the listing of needs addressed by the project: "Improve the Terminal as a place for passengers and the public to use and enjoy."

They also discussed the potential pedestrian tunnel connecting the Terminal and BART/Muni Metro at Market St. Our view is that this tunnel would help improve the Terminal as a multi-modal transit hub. However, AC Transit is more concerned with building the Terminal and bus facilities in a timely fashion. Therefore, we would suggest that the tunnel to Market St. be built if and only if there are sufficient funds available to complete both the basic project and the pedestrian tunnel. If funds are insufficient, Transbay Terminal could be designed and built in a way that allows the tunnel to be constructed at a later date.

As you know, AC Transit has been working on this project for many years. We look forward to completion of environmental review and early implementation of the project.

Yours Sincerely,



Kathleen Kelly
Deputy General Manager
Service Development

Cc: Ken Scheidig
Jim Gleich
Joe Schlenker
Greg Hunter
Tina Konvalinka
Nathan Landau

BART
30 YEARS OF SERVICE
YEARS OF PRIDE

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December 20, 2002

Paul E. Maltzer, Environmental Review Officer
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WILLIE B. KENNEDY
7TH DISTRICT

JAMES FANG
8TH DISTRICT

TOM RADULOVICH
9TH DISTRICT

RE: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Draft Environmental Impact Report (DEIR).

Dear Mr. Maltzer:

Thank you for the opportunity to comment on the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Draft Environmental Impact Report (DEIR).

As the operator of a rail network that extends into four counties, BART supports improved regional transit mobility. Last year, BART spearheaded a regional planning effort involving the Metropolitan Transportation Commission (MTC) and transit operators from throughout the region. BART staff and directors have also investigated opportunities to expand service with transit modes other than traditional BART technology. A well-designed Transbay Terminal and Caltrain extension project could significantly enhance regional transit options. If San Francisco is to retain its prominence in the Bay Area, it is important to maximize the effectiveness of transit projects linking San Francisco with its neighbors.

Since the proposed Transbay Terminal and Caltrain extension are intended to facilitate travel between the East Bay, San Francisco and the Peninsula, there is clearly a mutual and potentially complementary relationship between this project and BART. We are particularly interested in the interface between the Transbay Terminal and BART in Downtown San Francisco, connectivity, and facilitating long-term regional rail opportunities. Please consider the following comments:

- Pedestrian Connection to Embarcadero BART/Muni Metro
  The current surface connection between the Transbay Terminal and the Embarcadero BART/Muni Metro Station, which is described as "convenient" on page 1-16, is actually quite challenging. The description should be revised to illustrate the physical inconvenience of this connection more accurately, specifically referencing the distance, number of street crossings and elevation changes required to transfer between systems.

  Pages 2-36, 2-37 and 5-118 reference a pedestrian tunnel underneath Fremont Street to connect the Transbay Terminal with the Embarcadero BART/Muni Metro Station. If designed appropriately, such a connection could facilitate transfers between regional systems by removing conflicts between surface traffic and transit patrons, shortening transfer times, and reducing elevation changes. BART has recommended this connection in our Embarcadero Station Access Plan, released earlier this year.

We are concerned that the pedestrian linkage is not sufficiently described or analyzed in the DEIR. Page 5-119 states that only 700 transfers per day are estimated to occur between BART and Caltrain in Downtown San Francisco (only 2% of Caltrain riders, as indicated on page 5-135). Given the existing traffic volumes on the Bay Bridge and Highway 101 corridors, we believe this may be an underestimate and would like the Final EIR to provide a justification for this number. In addition, the EIR should be revised to describe the connection's "footprint" (including the width, height and depth of the proposed tunnel) and include a diagram illustrating its configuration. Besides reducing street-activating foot traffic, underground passageways may pose security concerns if they are underutilized and poorly designed. The EIR should discuss security-enhancing features such as retail activity, clear sightlines and cameras, and patron amenities. Additionally, the EIR should include and analyze a moving sidewalk option to shorten transfer times, reduce the frequency of missed connections, and improve convenience for senior citizens, people with disabilities, and patrons with luggage.

We recognize that funding may not be sufficient initially for an underground passageway. Consequently, a clearly-defined aboveground connection should be added as an alternative and analyzed in the Final EIR.

- Impacts on Current Transit Patronage

In describing impacts on corridor transit patronage on page 5-119, the DEIR notes that the Transbay Terminal/Downtown Caltrain Extension Project would reduce future BART ridership primarily along the San Mateo County extension. However, the DEIR does not substantively analyze the potential ridership impacts on BART's transbay service, which currently handles over 140,000 trips daily. For instance, the DEIR only minimally discusses the situation on page 5-120, stating that the project "would likely encourage transfers from Caltrain to AC Transit buses, thereby increasing AC Transit bus ridership".

For planning purposes, we would like the Final EIR to quantify potential system impacts on AC Transit and BART related to the improved Transbay Terminal. The Final EIR should also describe the assumed AC Transit transbay bus network and services levels used in the modeling process, as was done for SamTrans, Muni and Golden Gate Transit. Beyond the environmental process, we would also like to work with project sponsors in the future to help design transbay services that distribute transit resources efficiently and improve access to underserved areas.

- Connectivity with Other Rail Services

Page 2-4 references Muni's future Third Street Light Rail/Central Subway project. It is our understanding that the light rail line is planned to cross the Caltrain alignment in the vicinity of the existing Caltrain terminal at 4th and King, but that there are multiple options being considered for that area. Please indicate in the Final EIR both in text and on a map how the light rail line will interface with the relocated 4th/King Caltrain Station. For safety and security reasons and to minimize transfer times, it would be preferable if the stations were located adjacent to each other so that patrons do not have to cross streets or walk long distances unnecessarily.

- Future Rail Options

The Proposed Project includes expanded layover facilities for transbay buses within the reconfigured Transbay Terminal, with the potential for an additional transbay rail connection over the long-term. Implicit is an assumption that buses will be relied upon to accommodate most of the ridership growth in the transbay corridor, with rail options to be considered in

the future should funding materialize. Buses can add capacity immediately at a relatively low cost and are a key component of the transit network. However, growth is ultimately limited by roadway congestion and seating. The DEIR should more extensively consider the opportunities and limitations of different modes both in the transbay corridor and in the sizing and design of the terminal itself.

BART and the recent MTC Bay Crossings Study recognize that additional transbay rail capacity may be necessary in the future to accommodate ridership growth. As described on page 2-36, both the Second-to-Main and Second-to-Mission Caltrain Extension alternatives "could also be extended as a separate, independent project at some time in the future, to a San Francisco-to-Oakland cross-bay alignment for commuter rail and/or high speed trains". The DEIR should be revised to show how either alternative would be able to facilitate a second Transbay crossing. In particular, the Final EIR needs to clarify how the Second-to-Main alternative, which is oriented towards the South Beach district, could be extended across the bay.

In addition to the Transbay corridor, there are opportunities for rail expansion within San Francisco and elsewhere. For example, rapid transit along the Geary corridor has been contemplated for many decades. Potentially such a service could be linked with a future transbay rail crossing via the Transbay Terminal, which would increase transbay capacity and improve links between the East Bay and the northern half of San Francisco. However, it appears that the Transbay Terminal facility has not been designed for future rail service outside of the Peninsula and East Bay corridors. Regardless of current funding limitations, long-term expansion should not be precluded by the facility design. The DEIR should be revised to show how future rail projects, particularly in the Geary corridor, could interface with the Transbay Terminal facility.

We hope the Final EIR will provide for ongoing coordinated planning efforts among BART, the U.S. Department of Transportation, the Federal Transit Administration, the City and County of San Francisco, Caltrain, and the San Francisco Redevelopment Agency. As we develop a better understanding of future needs, we are especially interested in identifying underserved regional markets where the Transbay Terminal could provide additional capacity that complements the existing rapid transit network. In evaluating proposed services, BART would like to work with you to coordinate capacity analysis, ridership forecasting and service planning efforts.

Thank you again for the opportunity to comment on the DEIR for the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project. We look forward to working in partnership with to improve regional transit opportunities.

Sincerely,

Thomas E. Margro
General Manager

November 19, 2002

Mr. Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Mr. Maltzer:

Re: **Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the Transbay Transit Terminal/Caltrain Downtown Extension Project/Redevelopment Project**

Golden Gate Bridge, Highway and Transportation District (District) has reviewed the above-referenced document and offers the following comments as they pertain to District transit services near the Transbay Transit Terminal (TTT) area.

General Comment

- District concurs with the primary objectives of the Transbay Terminal/Caltrain Downtown Extension/ Redevelopment Project (Project) to improve public access to bus and rail services, modernize the Transbay Terminal, and reduce non-transit vehicle usage.

EIR Comments/Permanent Storage for Golden Gate Transit (GGT)

- DEIS/DEIR (pages S-1 and 1-1) describes the many transit benefits achieved by this Project. Equally important, however, is the project's inclusion of a permanent storage/layover facility for regional bus operators. This facility will continue to allow GGT to provide level of service and schedule reliability for its customers. Although passenger amenities are important for the general public, the ability for GGT to maintain level of service and schedule reliability are critical to the attractiveness and success of GGT bus service in San Francisco. Page 1-2 should also acknowledge the operational benefits provided for regional bus operators by this Project.

- A permanent midday storage facility is very critical to the retention of successful GGT bus service in San Francisco. District recommends that the bus storage and bus access ramps proposed by this Project be identified as a priority transit improvement that could be advanced independently in the event the Project is delayed.

- Table S-1 of DEIS/DEIR (page S-10) states that mitigation of displaced public parking by bus parking will be accommodated with a "parking deck" under the freeway between 3rd Street and 4th Street. This table should clarify that bus parking at grade level is the higher priority and public parking could co-exist onsite on a deck.

- Table S-1 (page S-17), under the Transit Operations/No-Project Alternative heading, should mention that a permanent storage facility for GGT is not provided under this scenario. Similarly, under Transit Operations/Full Loop Ramp Alternative heading, it should be mentioned that a permanent storage facility is provided for GGT.

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EIR Comments/Bus Access Ramps

- Figures 2.2-5 and 2.2-6 (pages 2-14 and 2-15) present the proposed off-site bus storage facility for GGT and AC Transit, and the direct access bus ramps connecting the off-site storage facility with TTT and Fremont Street. Although District appreciates incorporation by this Project of a permanent storage facility that it has sought since 1972 (i.e., when GGT began transbay bus service from Marin and Sonoma counties into San Francisco), there are some issues the DEIS/DEIR does not appear to address.

  1) The GGT off-site facility between 3rd Street and 4th Street is not shown to be directly connected to the ramp system proposed to TTT. The lack of a direct ramp from the GGT bus storage area makes this off-site facility completely vulnerable to weekday evening traffic congestion on 3rd Street. District strongly suggests that the feasibility of a direct ramp, as provided for the AC Transit off-street storage facility, be further investigated.

  2) The direct access ramp to Folsom Street is labeled on Figure 2.2-6 as a "possible future" connection. District strongly suggests that any potential lack of this connection as part of the Project is a serious shortfall. The absence of a direct connection between the off-site storage facility and Fremont Street would make GGT bus services in San Francisco totally dependent on evening peak period traffic conditions on surface streets. Potential congestion will decrease GGT schedule reliability and would likely require GGT to acquire a new staging facility near TTT.

EIR Comments/Street-Level Facility

- Figure 2.2-2 (page 2-10) presents proposed street-level facilities for GGT and San Francisco Municipal Railway (MUNI). A single 13-foot lane for bus boarding, although adequate from passenger and bus loading viewpoints, may prove problematic from an operating perspective should a bus become disabled in the 13-foot lane and a by-pass lane is not provided. To mitigate this operational concern, District recommends the DEIS/DEIR mention either a drop-off area for bus passengers at either the near side of the street-level facility on Beale Street or in front of the new TTT on Mission Street.

EIR Comments/Temporary Bus Terminal

- Page 2-20 discusses the proposed temporary bus terminal. It states GGT "would be allocated three bays on the curb." DEIS/DEIR should clearly state whether these bays are located on the Beale Street contraflow lane between Howard and Folsom streets.

EIR Comments/GGT Storage at 8th and Harrison Streets

- Page 2-18 correctly states that the current GGT midday storage facility, which presently occupies the site of the proposed temporary terminal, requires "a new site . . . to be identified." GGT is presently in the process of relocating its midday storage facility from the Main/Beale site to a leased lot at 8th Street and Harrison Street. This relocation should be accomplished in March 2003.

EIR Comments/GGT Service in San Francisco

- Figure 1.2-4 (page 1-15) incorrectly illustrates GGT bus service on Folsom and Howard streets. Since 1997, GGT "Civic Center" service has operated on Mission Street. (Figure 3-1 on page 3-2 is correct.) With the anticipated relocation of its midday storage facility from Main and Beale streets to 8th and Harrison, GGT is planning to resume revenue service on Folsom and Howard streets. District Planning Department staff will provide the exact routing of bus service in the South of Market area as soon as it becomes available.

- Page 3-20 and Table 3.1-11 (page 3-22) of the DEIS/DEIR should make the following clarifications concerning GGT Basic Service in San Francisco.

  1) GGT Basic Service generally operates every day and nearly 24 hours per day.

  2) Route 10 operates only on weekends in San Francisco; Routes 30 and 90 operate only on weekdays.

- Figure 3.1-6 (page 3-21) does not show GGT Route 67 and Route 69 correctly. Route 69 is a ferry shuttle route that serves San Francisco Ferry Terminal and the Financial District. Route 67 is a ferry shuttle route that serves San Francisco Ferry Terminal and the Civic Center.

- Information on page 3-20 of the DEIS/DEIR should be updated to include the current District one-way adult cash fares.

Weekday Fares	
Golden Gate Transit transbay bus	$2.65 - $5.65
Golden Gate Ferry; SF to Sausalito	$5.60
Golden Gate Ferry; SF to Larkspur	$3.25
Weekend/Holiday Fares	
Golden Gate Transit transbay bus	$2.65 - $5.65
Golden Gate Ferry; SF to Sausalito	$5.60
Golden Gate Ferry; SF to Larkspur	$5.60

- Table 3.1-11 (page 3-22) should be revised to include the following clarifications concerning GGT bus service in San Francisco (as of September 2002):

  1) Route 90 has two (not one) southbound trips that serve the Transbay Terminal area.

  2) Route 72 has headways that vary between 14 and 55 minutes (not one peak period trip).

- Page 3-23 should not describe District sponsored Club Bus services from Napa and Sonoma County to San Francisco as "Regional Paratransit" service. These are subscription commute bus routes that serve the Transbay Terminal via bus stops on Mission Street. As of March 2001, the Napa Valley Commute Club operates one southbound and one northbound trip during the peak period. As of October 2002, the Valley of the Moon Commute Club operates two southbound and two northbound trips during the peak periods.

  Regional Paratransit services to TTT include services correctly described on page 1-8 of the DEIS/DEIR.

- Page 3-49 should acknowledge that most GGT buses and all Golden Gate ferries are equipped to transport bicycles.

EIR Comments/Paratransit and Taxi Services

- DEIS/DEIR should mention that a new TTT should be designed to provide a street level paratransit transfer location adjoining the primary taxi zones as well as the ground level terminal facilities between Fremont Street and First Street. Enclosed is an October 24, 2000 letter from the Partnership Transit Coordination Committee to Metropolitan Transportation Commission (MTC) pertaining to many design-

related issues. It is offered for your information.

- There is very little information in the DEIS/DEIR pertaining to taxi service to and from the new TTT. This issue may be critical from street level activity, terminal space allocation, and traffic congestion viewpoints. Since taxi service may potentially become a significant mode of access to and from TTT with the introduction of high-speed rail service (albeit a separate future project), District recommends that taxi service to and from TTT be discussed in the DEIS/DEIR.

EIR Comments/Ferry Building

- Page 4-52 attributes the decline in use of the Ferry Building "to almost nothing" as being a result of electric trains over the Bay Bridge. The DEIS/DEIR should recognize that the decrease in ferry transportation described only reflects travel to and from the East Bay. Overall decline in ferry transportation to the Ferry Building is primarily attributed to construction of the Bay Bridge (for East Bay communities) and the Golden Gate Bridge (for North Bay communities).

  The DEIS/DEIR should acknowledge the current growth in ferry transportation at the Ferry Building and its status as a regional transportation facility.

EIR Comments/Miscellaneous Issues

- Page 1-25 describes membership of the Transbay Joint Powers Authority (JPA). DEIS/DEIR should acknowledge that the this District is an ex-officio member of the JPA.

- It appears the restriping of Fremont Street traffic lanes between Mission Street and Market Street, described on Page 3-35, has already been implemented. In addition, tracks for the former F-Market Muni have been removed.

EIR Comments/TTT Alternatives

- Page 5-2 describes Impacts Common to Both Transbay Terminal Alternatives. It states how GGT and AC Transit buses would be stored on a lot on Harrison Street between Second and Fourth Streets. It is not clear whether the lot described is referring to the proposed off-site storage facility bounded by 2nd, Perry, 4th and Stillman streets. It is also not clear, based on description of the Loop Ramp Alternative (see pages 2-14 and 2-15) whether an off-site facility will be provided for GGT.

- Table 5.19-1 (page 5-110) summarizes the two TTT and No Project Alternatives in terms of bus operational differences. It compares bus storage locations, travel times, and travel distances for the alternatives. This table raises the following questions as they pertain to GGT bus operations.

  Bus Storage: This table indicates bus storage for the Full Loop Alternative will occur on the on-site ramps and off-site storage lot. Please specifically identify where storage would occur for GGT buses.

  Travel Distances: Estimated travel distances are provided for AC Transit. Travel distances for GGT buses should also be provided.

  Travel Times: Estimated travel times are presented for AC Transit operations. Estimated travel times for GGT operations should also be presented.

EIR Comments/West Ramp Alternative

- Page 5-111 clearly describes how AC Transit would operate between the off-site storage facility and TTT. It states, "AC Transit buses would operate independently of local traffic between the Bay Bridge, the storage area, and the Transbay Terminal. Direct connections would be provided on elevated ramps. . .." Other than reference to the storage facility for GGT buses, no reference is made to how GGT buses would operate between the off-site storage facility and the beginning of revenue service on Fremont Street. As part of consensus building and planning efforts with MTC, there was considerable discussion of providing GGT buses with ramps that would also permit buses to operate independently of local traffic. District staff had understood that ramps connecting the off-site storage facility and Fremont Street would be provided. These ramps would assure GGT level of service and schedule reliability and potentially reduce operating costs. This is also true in light of traffic-related impacts discussed in Chapter 5 of this document (see comments below).

- Page 5-111 does not clearly describe features of the West Ramp Alternative for GGT bus operations. It cites Muni and Golden Gate Transit bus operations, patron entry, ticketing, and joint development. DEIS/DEIR should clearly identify features and specify the benefits for GGT of this TTT Alternative.

- Page 5-113 notes "a direct connection between the Terminal and the surface streets was determined to be unnecessary for bus operations." District staff has repeatedly mentioned during consensus building and planning process with MTC that the current street access to TTT and access from Second Street south of Harrison Street via the elevated ramps requires an additional two miles of deadhead travel for GGT. District requested that a design option consider direct access from city streets to the terminal be investigated at the outset of this project. For example, District staff suggested a contraflow lane be considered on the Fremont Street off-ramp as a potential low-cost design option.

- Second paragraph of page 5-114 cites "any significant expansions in Muni or GGT capacity would require the staging of buses at an alternate location." How much expansion by Muni or GGT would trigger this additional staging? Where would this additional staging be located?

- Fourth paragraph of page 5-114 cites GGT "commuter service would also be able to use the new mid-block boarding area. Golden Gate Transit's basic service . . . would continue to load and alight passengers along Fremont Street between Mission and Howard." This description of GGT service is not accurate and needs to be revised. Page 5-136 describes potential GGT operations as a result of the mid-block boarding area. There doesn't appear to be consistency between GGT operations described on page 5-114 and 5-136. Nevertheless, the following describes probable GGT operations with the new mid-block boarding area and can be incorporated into the DEIR:

  Basic Service: Inbound GGT Basic Service buses, which operate on Mission Street, would terminate in front of TTT on Mission Street (as they do presently). The proposed TTT mid-block boarding area would be used as the first revenue stop by outbound GGT Basic Service buses.

  Financial District Commute Service: Inbound GGT Financial District Commute Service buses would serve TTT by the current bus stop on First Street, between Market and Mission streets, and would not likely be affected by any of the TTT alternatives. Outbound Commute Service would be affected by the location of the off-site bus storage facility and elevated ramps mentioned previously. In the event of a direct connection between the off-site facility and Fremont Street, GGT commute buses would serve TTT with existing bus stops on Fremont Street.

- Page 5-116 makes reference to a change in GGT operating costs following construction of the off-site

storage facility. EIR should refer to upcoming relocation of GGT's midday storage to the 8th and Harrison Street site (effective March 2003) to determine the new site's affect on GGT operating costs

EIR Comments/Loop Ramp Alternative

- Page 2-18 of the DEIS/DEIR describes bus storage for the Loop Ramp Alternative to occur on the (elevated) bus ramps for TTT. DEIS/DEIR does not specifically mention whether bus storage for GGT is provided, although Figure 2.2-7 (page 2-17) indicates "Additional Bus Storage (under Bay Bridge Approach)." The description of this TTT alternative does not clearly indicate whether a permanent midday storage facility is provided for GGT. Absence of a midday storage facility for GGT, for any TTT alternative, is a serious shortfall and does not adequately address the needs of GGT bus services in San Francisco. Similarly, direct access ramps connecting an off-site facility and Fremont Street need to be accommodated.

- Page 5-116 cites this TTT Alternative would feature "street level bus service for Muni and Golden Gate Transit . . . in the block east of Beale Street (as opposed to the mid-block crossing between Fremont and Beale as proposed in the West Loop Alternative')." The DEIS/DEIR does not provide any further description of this street-level arrangement. How many berths will GGT be provided? Where would this street level bus service be located? How will GGT bus operations (e.g., access between a midday storage facility and the beginning of revenue service) be affected?

- Page 5-117 cites "both AC Transit and Golden Gate Transit would be available beneath the western approach of the Bay Bridge at Second Street." How does the space, layout, and the ability to provide a direct ramp between the midday storage site and Fremont Street (i.e., a route of travel that is independent of local street traffic) vary for GGT buses compared to the West Ramp Alternative?

- No reference is made on page 5-117 concerning GGT operating costs with this TTT Alternative. EIR should refer to upcoming relocation of GGT's midday storage to the 8th and Harrison Street site (effective March 2003) to determine the new storage facility's affect on GGT operating cost.

EIR Comments/Operating Costs

- Page 5-120 presents an estimated $312,000 annual increase in GGT operating costs attributed to the relocation of the midday storage function from the current lot at Main/Beale to the new off-site storage facility beneath I-80. This cost estimate assumes GGT midday storage at the current Main and Beale lot. GGT will be relocating its midday storage operation to a lot on 8th and Harrison streets in March 2003. GGT operating cost impacts relative to the relocation to a the proposed storage facility should assume the 8th and Harrison site as the existing condition.

EIR Comments/Traffic Impacts

- Page 5-126 states the project "would result in adverse (traffic) impacts" and "mitigation measures for the seven (impacted) intersections have not been proposed, and the impacts associated with the Project would be considered adverse and unmitigatible . . .." District recommends full consideration of direct ramps between GGT off-site storage facility and Fremont Street to eliminate circulation of GGT bus traffic on local streets during the evening peak period when traffic conditions surrounding the TTT area operate under extreme levels of congestion.

- According to Table 5.19-5 (page 5-123) Harrison Street and Second Street currently operate at LOS E (delay of 44.9 seconds and v/c capacity at 1.11). Given the close proximity of this intersection to the proposed GGT off-site storage facility, District believes that GGT will be highly susceptible to traffic

queuing on Third Street. District, therefore, urges consideration of a direct ramp connecting the storage facility with the Fremont Street off-ramp.

- Similarly, Table 5.19-5 (page 5-123) cites poor traffic levels-of-service throughout the TTT area under existing and projected 2020 conditions. GGT needs direct ramps between the off-site storage facility and Fremont Street. Lack of these ramps would require a street level staging area near the TTT area.

EIR Comments/Pedestrian Impacts

- Page 3-44 of the DEIS/DEIR provides an accurate portrayal of sidewalk conditions at GGT bus stops on Fremont and Mission streets near TTT. It accurately describes potential conflicts between queuing bus passengers and sidewalk pedestrians on sidewalks that are narrow and furnished with street furniture that effectively reduces pedestrian space. The DEIS/DEIR also highlights the benefits for both queuing bus passengers and sidewalk pedestrians of the Fremont Street overhang of the existing 350 Mission Street building. District strongly advocates the use of overhangs for new buildings constructed in San Francisco with adjoining bus stops to reduce sidewalk obstacles.

- The DEIS/DEIR also discusses the general lack of curb space for GGT buses on Fremont Street. For this reason, GGT Routes 2, 4, and 8 completely bypass the TTT area. District supports expansion of GGT curb space near TTT to enhance bus passenger queuing space and facilitate consolidated bus operations.

- Page 5-131 summarizes pedestrian levels-of-service in the TTT study area. The poor levels-of-service at the Mission and Fremont street intersection highlight the need to make improvements at the street level for bus queuing passengers and sidewalk pedestrians.

- Since a mid-block pedestrian analysis for the sidewalks on Fremont Street between Market and Mission, and between Mission and Howard streets, was not performed, the EIR does not address levels of sidewalk congestion that could be exacerbated for 2020 Baseline Plus Project conditions.

- Page 5-136 recommends potential mitigating measures to enhance pedestrian flow near TTT. District supports these strategies, not only for TTT area but for all new buildings built in San Francisco.

EIR Comments/Construction Impacts

- District would appreciate if traffic control plans, cited on page 5-139, could also be developed in conjunction with District staff. All short- or long-term construction detours and street closures will affect traffic conditions and GGT schedule reliability. Ultimately any prolonged effects on schedule reliability and the continued availability of bus stops near TTT have the potential to decrease the attractiveness of GGT bus service as an alternative means of transportation to and from San Francisco.

- Figure 5.20-8 (page 5-161) presents an estimated construction phasing for the TTT project. It estimates construction of off-site storage facilities and access ramps during the fourth and fifth years of construction. District requests construction of the off-site storage facility be initiated as soon as possible after this site becomes available subsequent to Caltrans' seismic retrofit project in order to address GGT permanent midday storage needs in San Francisco.

- Figure 5.21-1 (page 5-163) illustrates and page 5-165 discusses access to the temporary TTT at the site currently occupied by GGT's midday storage facility. District appreciates efforts by this project to accommodate GGT bus service during construction of a new TTT.

1) Figure 5.21-1 and page 5-165 appear to only accommodate GGT's outbound service since no inbound GGT stops are indicated. District's inbound Basic Service bus stops are required on Mission Street, either between Fremont Street and First Street (as in current conditions) or, if not available, between Beale Street and Fremont Street (shown in Figure 5.21-1 as a San Mateo County/Muni bus stop). District desires to serve both the existing TTT and temporary TTT to facilitate transfers with other regional transit operators.

2) For GGT outbound stops, this figure shows a GGT layover on Folsom Street, a Beale Street bus stop (far side Folsom), and a Fremont Street bus stop (far side Mission). GGT currently has three bus stops on Fremont Street (near side Mission). These bus stops either have to be maintained during project construction or otherwise accommodated near the existing terminal.

District staff appreciates the opportunity to comment on the DEIS/DEIR for this project. Please call Principal Planner Maurice Palumbo at (415) 925-0160 if you have questions.

Very truly yours,

Alan R. Zahradnik
Planning Director

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CAPITAL PLANNING & EXTERNAL AFFAIRS DIVISION • MUNICIPAL TRANSPORTATION AGENCY

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December 17, 2002

Mr. Paul Maltzer
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Mr. Jose Campos
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Dear Mssrs. Maltzer and Campos:

With this letter, Muni is submitting comments on the Draft EIS/EIR for the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project. We are pleased to see this project moving forward, as it is a very important project for the future of transportation in San Francisco and for the entire Bay Area. This project is critical as a major regional linkage, and will improve transit services for a wide variety of riders. Muni will be happy to work closely with the project designers as this project moves forward, and we look forward to playing an integral role in the city's efforts to implement this project.

Muni has participated for several years in the planning of the proposed new Transbay Terminal, including in the Metropolitan Transportation Commission planning efforts and in charettes led by Simon Martin Winkelstein and Morris (SMWM), as a consultant to MTC. We also interacted extensively with John Eddy at Arup during the MTC planning effort, and developed concepts that should be brought into this EIR/EIS process.

Muni has reviewed the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project Draft EIS/EIR, and we have the following comments:

General Comments:

Muni, with 750,000 rides per weekday, is the largest transit operator in the Bay Area and seventh largest in the U.S. Muni's two largest transit corridors are Market and Mission Streets, both of which feed into Transbay Terminal. Muni currently serves the Transbay Terminal with a number of motor coach (MC) and trolley coach (TC) routes, and Muni is by far the highest volume carrier at street level at this facility, both in terms of riders and in terms of number of vehicles.

Muni is concerned that the Transbay Terminal EIS/EIR does not fully address Muni's current and future needs for Muni service to the Transbay Terminal, including serving current riders, a future Geary light rail line, new customers arriving on Caltrain and other heavy rail services, and new residents and employees in the Transbay Terminal Redevelopment Area. We are concerned that the space allocated to Muni in this document is the minimum level needed for current operations, and does not allow for any of the capacity expansions to our service that can reasonably be foreseen. One good example of this is that, although Muni's surface light rail tracks were recently removed from in front of the existing Transbay Terminal, Muni needs the flexibility to be able to serve the new Transbay Terminal with historic streetcar

lines in the future, such as the F and/or E-lines. Muni would like to discuss these issues with you in more detail and to work closely with you to make sure that Muni's needs are met.

Our other main concern is that Muni has done a significant amount of work on a future Geary light rail subway connecting to Transbay Terminal, which is not referenced in this document. Muni worked with the consultants and staff on the January 2001 MTC study to ensure that provisions for future Geary light rail subway would be included in the new facility, including protection of right–of-way, provision for terminal space in the facility, and other aspects needed to integrate a future Geary LRT line into the facility. We recommend that the work done for the 2001 MTC study be reviewed in this light, and appropriate modifications be made to this document to reflect that work, so that the concepts developed at that time can be developed and expanded in the CER and PE phases of the Transbay Terminal project. Our primary concern is that subway access under Folsom (or Howard) be maintained for the Geary LRT branch off of the Central Subway between Third Street and the Transbay Terminal, and that terminal space for the line be reserved. We want to ensure that neither the Caltrain extension nor the Geary LRT subway project proceed with design assumptions that would preclude the other project from proceeding, particularly at locations where the alignments meet and/or cross. Again, we would be happy to meet to discuss the Geary LRT project in greater detail.

Specific Comments:

Page 1-28 – Table 1.2-4:

The SF Parking & Traffic Commission and SF Public Transportation Commission were merged into the SF Municipal Transportation Agency (MTA), effective July 2001. MTA approval is required for municipal public transit route realignments, surface street changes, traffic operation changes, traffic control measures, and on-street parking changes.

Pages 1-26 and 2-4 to 2-5, and Table 2.1-1:

- The elevated Central Freeway, US 101, connects I-80 with Fell and Oak Streets. This will be rebuilt and retrofitted only south of Market Street. The portion north of Market Street will be torn down and replaced by the new Octavia Blvd.
- The Third St. LRT Project Initial Operating Segment (IOS) is expected to be open for full service in 2005; an early partial opening may occur in late 2004.
- The Central Subway is expected to be in service in 2012, not 2009.
- The Ferry Bus Terminal was a "relocation" project in anticipation of hotel construction, not an "expansion", and was completed in Fall 2001.
- Muni's F-Line Historic streetcar service opened for service from Castro/Market Streets along the Embarcadero to Fisherman's Wharf in March 2000, and currently carries approximately 20,000 riders per day. Muni's E-Line station improvements on the Embarcadero and King Streets for historic streetcar service between Fisherman's Wharf and 4th/King Streets will be under construction in 2003.

Chapter 2 – Description of the Project Alternatives

This section should include descriptions of the future Geary light rail subway and its interface with the Transbay Terminal and the Caltrain alignment. There should be a new section that describes the route that the subway would take from a junction with the Central Subway at Third & Folsom (existing design concept), or possibly from Third & Howard, then under Folsom or Howard to Transbay Terminal. This section should describe how the subway would be related to the Caltrain underground alignment and any other underground features and how the station would be integrated into the Transbay Terminal. Muni's proposal for all of these features was presented to the MTC project team in 2000. Attachment A is a map from the Executive Summary of the project report that indicates two conceptual alignments for the Transbay Terminal branch off of the Central Subway. Although the alignments shown do not reflect our

precise preferred alignment, they do indicate that this issue was known at the time the report was issued in January 2001. Attachment B is more detailed information on the Geary project, from the April 1995 Geary Corridor System Planning Study.

Page 2-4 – Section 2.1.2 Muni Facilities and Related Bus Service

The Third St. LRT Project Initial Operating Segment (IOS) is expected to be in full revenue service in 2005. The Central Subway is expected to be in service in 2012, not 2015.

Page 2-4 – Section 2.1.5 Roadway and Street Improvements

The elevated Central Freeway will no longer connect with Oak and Fell Streets. It will be removed north of Market Street and replaced with the new Octavia Boulevard. The reference to a new King Street access roadway at Fifth Street into Mission Bay should be clarified, as to whether or not this roadway extends only south of King Street across Mission Creek, or whether it is intended to cross the Caltrain alignment.

Page 2-6 - Section 2.2 Project Components

Include a description of the future Geary LRT line as an additional component of the project.

Page 2-7 – Section 2.2.1 Transbay Terminal Alternatives

Include a description of the future Geary LRT line as an additional component of the project.

Page 2-8 – Figure 2.2-1 - Transbay Terminal West Ramp Alternative Map

The location of the future Geary LRT line should be indicated on this map.

Page 2-9 – Section 2.2.1.1 - Transbay Terminal West Ramp Alternative

In the discussion on the floor plan, note that space for a Geary LRT subway station would need to be accommodated in the design.

Page 2-10 - Figure 2.2-2: Muni & Golden Gate Transit Street-Level Facilities

The area designated for Muni and Golden Gate Transit to share street-level facilities in the blocks between Fremont and Beale and between Mission and Howard is the minimum space necessary to accommodate current operations, and does not allow for growth and expansion in the future. While the size and capacity of the overall area may initially be adequate, the number of lanes for Muni, the island configuration and the storage areas need to be able to accommodate future capacity expansion and provide flexibility for growth in the future. Muni needs at least five (5) separate lanes inbound (not four, as shown in Figure 2.2-2), with three (3) boarding islands, which can be shorter than the islands shown. Also, Muni needs layover areas. These needs were identified and communicated in meetings regarding Muni and the Transbay Terminal in the period 1999-2001. The following information was communicated to MTC planners in memos and meetings (including 3/24/00), and summarizes Muni's needs for street-level facilities:

TRANSBAY TERMINAL PLANNING: MUNI OPERATING REQUIREMENTS

Alternative 2: Muni in new street between Fremont-Beale/ Mission-Howard:

- Accommodate current Muni lines: 5, 6, 38, 38L, and possibly two other lines (e.g., 2, 3);
- Have the capability to bring in Muni historic streetcar rail lines (E and/or F);
- Provide space for bus stops and layover areas;
- Provide space on Mission Street for Muni lines: 14, 14L (14L terminates in Transbay Terminal street-level facility on Saturdays);
- Provide space on First & Fremont Streets for bus stops for Muni's 10-lines;
- Provide space inside Transbay Terminal upstairs for Muni 108-Line, and provide access to on-street terminals from freeway ramps if terminal is not open 24 hours a day, 7 days a week;
- Provide for future flexibility and growth;
- Also accommodate at least two other Muni Lines: 1 & 41, in Muni terminal area or on Beale St.; and
- Difficult to achieve MUNI needs if area is shared with Golden Gate Transit.

Minimum Requirements for Muni:

➢ The Transbay Terminal should provide convenient and safe transfer activity between Muni and the other primary terminal operator; AC Transit.

➢ The approach to the Transbay Terminal and exit from the terminal by motor coaches and trolley coaches should be at least as safe and efficient as the present condition. Traffic patterns in and around the terminal must efficiently accommodate at least the current level of activity, and should provide for capacity expansion.

➢ The terminal should accommodate at least the minimum number of vehicles on the lines shown below. The type and size of the vehicle, the number of coaches on each line that will need to lay over at any one time at the terminal, and the number of trips per hour at the peak are shown following the line designation *(note: Muni lines, vehicle sizes and numbers of coaches may change over time)*:

- 38-Geary, Motor Coach (MC), 60' (3 coaches at a time, 20 trips per hour);
- 38-Geary Limited, MC 60' (2 coaches at a time, 16 trips per hour);
- 5-Fulton, Trolley Coach (TC), 40' (2 coaches, 13 trips/hr);
- 6-Parnassus, TC 40' (2 coaches, 11 trips/hr);
- 2-Sutter, MC 40' (1 coach, 8 trips/hr), may be converted to TC in the future;
- Provide space on First & Fremont Streets for bus stops for Muni's 10-line;
- Provide space inside Transbay Terminal upstairs for Muni's 108-Line, and provide access to on-street terminals from freeway ramps if terminal is not open 24 hours a day, 7 days a week;
- 1-California, 40' or 60' TC (2 coaches, 12 trips/hr) – either inside street-level facility at Fremont & Beale, or on the street on Beale; and
- 41-Union 40' TC (2 coaches, 10 trips/hr) – either inside street-level facility at Fremont & Beale, or on the street on Beale.

➢ Each line needs an independent storage lane that can accommodate the number of coaches needing to lay over at any one time.

➢ At least two 6" high boarding islands, at least 40' by 8' each for each lane.

➢ Safe areas to exit passengers, which includes an 8'x 6' area to deploy wheelchair lifts.

➢ An area to park a supervisor's automobile and a revenue or maintenance truck.

- Muni operator restrooms (separate restrooms for men and women).
- A space in the terminal with direct access to the Bay Bridge to accommodate the layover and passenger loading for Muni's 108-line Treasure Island service (assume 1 bus every 20 minutes). Also, when the terminal is closed (e.g., in the middle of the night) and the 108-Line is still running to Treasure Island, provide a location for the 108-line to load and for a convenient route from the street-level facility at the terminal to the Bay Bridge.
- A covered area or shelter for waiting passengers in close proximity to passenger boarding areas. Assume up to 40 passengers at any one time.
- The Muni loading and layover areas should be flat, with the loading areas easily accessible for disabled passengers.
- The Muni areas should accommodate expansion of up to 2 additional lines, or 4 buses at any one time and 24 per hour.

Page 2-15 – Figure 2.2-6 - Transbay Terminal Off-Site Bus Storage Ramp Link

This drawing contains a faint dashed line that is labeled "Possible Future Light Rail Connection", but the line is shown to come from the east, apparently from the Bay Bridge. Clarify what this line is intended to represent.

Page 2-16 – Section 2.2.1.2 - Transbay Terminal Loop Ramp Alternative

In the discussion on the floor plan, note that space for a Geary LRT subway station would need to be accommodated in the design.

Page 2-17 – Figure 2.2-7 - Transbay Terminal Loop Ramp Alternative Map

The location of the future Geary LRT line should be indicated on this map.

Page 2-18 – Section 2.2.1.3 - Transbay Terminal Construction

This section should include a description of how provisions for the Geary LRT subway would be made in advance of the actual construction of the subway. It is likely that the new Transbay Terminal would be built before the Geary subway, so it would be important to ensure that an appropriate "box" be built at the time the terminal is constructed to reserve space for the subway and station.

Page 2-19, Figure 2.2-8: Layout of Temporary Bus Terminal:

The Temporary Bus Terminal will need to include provisions for trolley wire on the streets adjacent to the Temporary Bus Terminal, not just in it. This would also include a new boarding island on Beale Street near Howard for the 1-California trolley coach line. These, along with other Muni issues, were discussed with MTC consultants in 1999-2001:

The following is a summary of how bus lines will be routed during the operation of the Temporary Transbay Terminal facility (2003-2006?) at Howard/Beale/Folsom/Main. This is subject to revisions as the design develops, and we will need to work with the project engineers to ensure that appropriate routings are available to us:

Trolley Bus Routes:

- **5-Fulton/ 6-Parnassus**: Continue inbound (IB) on eastbound (EB) Market to Beale, southbound (SB) Beale, left to EB Howard, right into terminal loop at Main (SB contra-flow lane), drop-off passengers at terminal drop-off just south of Howard, continue around loop to layover on westbound (WB) Folsom between Main and Beale (5-line uses first position, 6-line second position). Resume outbound trip with right onto northbound (NB) Beale contra-flow lane, pick-up passengers on Beale south of Howard, left onto WB Howard (protected signal phase), right onto northbound (NB) Fremont, resume existing outbound (OB) route.

- **1-California** - Existing IB route on SB Beale to switch mid-block between Mission and Howard, switch onto left-side curb diamond lane, drop passengers and layover at new boarding island on Beale, NS Howard. Pick-up passengers at island and resume OB trip by making a left onto EB Howard, left onto NB Main, continue on current OB route.

- **41-Union** – Existing IB route on SB Beale, left onto EB Howard, left onto NB Main. Drop off passengers and layover at existing layover location on East Side of Main FS Howard. Pick-up passengers and leave layover, resume existing routing on NB Main.

- **Turnbacks** – ensure that the following turnbacks for trolley coaches would be available:
  - Turnback 14-Mission coaches from IB to OB via right on SB Beale from EB Mission, right on Howard, right on NB Fremont, left on WB Mission.
  - Route 14-Mission coaches into terminal via right on SB Beale from EB Mission, left on Howard, right into terminal, around terminal loop to left on WB Howard, right on NB Fremont, left on WB Mission.
  - Pull-ins on 1, 5, 6, and 41-lines that will by-pass the terminal - use right-hand mid-block switch on SB Beale between Mission and Howard, drop-off passengers NS Howard, right onto WB Howard, normal route back to Presidio or Potrero divisions.

Motor Coach Routes

- **38/38L/2** – Continue IB route on EB Market to Beale. Right on SB Beale to Howard, left on EB Howard, drop-off passengers on the south side of Howard between Beale and Main, right onto main (contra-flow lane), layover at curbside at curb lane on SB Main St. (contra-flow lane). Resume outbound trip with right onto NB Beale, left onto WB Howard (protected phase), right onto NB Fremont, resume existing OB routing onto WB Market.

Muni has also developed some cost estimates for Muni operating and capital costs associated with the Transbay Temporary Bus Terminal, which were provided to MTC. Attachment C is a copy of the letter provided to MTC in March 2001 detailing both the capital and operating costs summarized below:

Operating Costs: Muni estimated the additional annual operating and maintenance costs associated with the Temporary Transbay Terminal at just under $1 million in FY 2000 dollars. These costs are for added service on the 2, 5, 6, and 38/38L lines. Muni does not currently have funding in the operating budget for these increased costs, and a Transbay Terminal project-funding source will need to be identified to provide funds for Muni's operating budget while the Temporary Transbay Terminal is in operation.

Capital Costs: Muni estimated the total capital cost for the Temporary Transbay Terminal at $5.7 million. This cost includes new trolley overhead, strain poles, and special work. It also includes the provision of a temporary street supervisor's office at the temporary bus facility and a temporary operator restroom for the 1-California trolley coach line at its terminal on Beale Street. The existing 1-line restroom on Howard Street will need to be removed when the Temporary Transbay Terminal facility is constructed. The terminal should also provide space for street supervisors and maintenance personnel to park their trucks. Muni does not currently have capital funding planned, programmed, or awarded for these costs, and a Transbay Terminal Project

funding source will need to be identified to provide funds for Muni's capital costs for the Temporary Transbay Terminal.

Page 2-28 and 2-29 – Figure 2.2-15 and 2.2-16 – Plan & Profile Drawings

The location of the future Geary LRT line should be indicated on these drawings.

Page 2-32 and 2-33 – Figure 2.2-19 and 2.2-20 – Plan & Profile Drawings

The location of the future Geary LRT line should be indicated on these drawings.

Pages 3-2, Figure 3-1 Transit Network in the Project Area; and 3-12, Figure 3.1-2 Muni Service at the Transbay Terminal

- Muni service in the Project Area is not adequately represented on this map, particularly the service that currently serves the Transbay Terminal from First Street, as well as the service that continues south on First to Howard (the 10-line), and goes north on Fremont from Folsom (the 10-line). While this service is correctly depicted in Figure 3.1-2, it should also be shown in Figure 3.1.
- The station depicted at 4th and King Streets in the middle of King Street is the Muni Metro station named "4th & King/Caltrain" station, not the Caltrain Station.
- The map in Figure 3.1, as well as others in the EIS/EIR, has a significant highway omission in the base map. It fails to show the touchdown ramps from I-280 to/from King Street in the vicinity of Fifth Street. The primary access to and from I-280 is now via King Street.

Section 3.1.5 – Future Rail Transit and Bus Service – Pages 3-26 through 3-28

This section should include a major Geary rail or bus project as a possible future transit project in the study area. Muni performed a Geary Corridor Planning study in 1994 and 1995, and we have attached excerpts from the Final Report showing the project recommendations and alternatives for terminal configurations (Attachment B). The Geary study recommended moving forward to a Major Investment Study (MIS) and EIS/EIR with three alternatives:

- Light Rail, all-surface configuration (to Transbay Terminal on a street alignment basically the same as discussed for the E and F-lines in these comments).
- Light Rail, surface configuration west of Laguna, subway east of Laguna
- Trolley Coach, surface configuration west of Laguna, subway east of Laguna

The Geary alternatives with subway configurations contained several proposed downtown routings for the subway. The most likely alternative is for the Geary line to use the Central Subway in the downtown area through the Union Square area and then into South-of-Market, with a branch off of the Central Subway at 3rd Street & Folsom (or Howard) for the Geary line, proceeding easterly under Folsom (or Howard) Street to Beale, directly behind the Transbay Terminal. One of the alternatives also included the Central Subway branch coming to the surface on either Folsom or Howard.

At the time the study was performed, Muni's governing board, the Public Transportation Commission (PTC), accepted the report and elected not to move forward to an MIS and EIS/EIR until a viable financial plan could be developed. The PTC also elected not to select a preferred mode and alignment.

A Geary project is one of the four corridors listed in the San Francisco County Transportation Authority's "Four Corridor Plan", and is also included in Muni's recent publication "A Vision for Rapid Transit in San

Francisco", and has been included in Muni's Short Range Transit Plan. Given the proximity to the Transbay Terminal, it should be mentioned in this section.

In 2002, as part of the Muni publication "A Vision for Rapid Transit in San Francisco", MUNI developed a service plan for a Bus Rapid Transit (BRT) Service on Geary, which would significantly reconfigure and speed service on the Geary corridor, from Transbay Terminal to Ocean Beach. This change would increase ridership on the corridor by approximately 5,000 people a day, and would include increased service from the Transbay Terminal. The Geary BRT corridor will be included in an amendment to Muni's SRTP/CIP, and would be operational before any new rail service in the corridor.

This section should also include a discussion of potential future high-speed rail (HSR) service to the Transbay Terminal, including projections of the number of riders expected to use the terminal. HSR could add significant numbers of users to the terminal, and should be considered. In addition, this EIS/EIR should be reviewed with California High Speed Rail staff, if this has not already been done.

Page 3-27 - Section 3.1.5.3 and 3.1.5.4 – Muni Third Street Light Rail and Muni Central Subway

Muni's Third Street Light Rail project has two phases. Phase 1 is the Initial Operating Segment (IOS), and is referenced in Section 3.1.5.3. Phase 2 is the New Central Subway (NCS), and is referenced in Section 3.1.5.4. These two sections should be combined into one section labeled "Third Street Light Rail Project", with discussion of the two phases as two phases of the same project. Also, it is important to note that the New Central Subway alignment in the South of Market area under Third Street will be built complete with the junction connections for the Geary subway branch to Transbay Terminal.

Section 5.19.3.2:

It is not a correct assumption that both the 30-Stockton and 45-Union would be rerouted along Mission Street after the Caltrain extension is in place. One of those lines will still continue to serve 4th and 3rd Streets between Market and Townsend, and will be extended into Mission Bay. The other line will likely be terminated in the vicinity of Yerba Buena Center. It is questionable, however, if the Caltrain Extension would be the triggering event to truncate one of these lines in the Yerba Buena area. It is more likely that the construction of Phase 2 (New Central Subway) of the 3rd Street LRT line would be the event that would cause Muni to truncate one of these lines.

Figure 6.6-1, Capital Financial Plan:

It may be unrealistic to assume that value engineering will reduce the cost of the Transbay Terminal Project by as much as $170 million, particularly in light of the inevitable pressure to add more to the project scope during the outreach process to affected communities and neighborhoods, and as required mitigation for construction phasing, etc. Muni has always found that project scopes tend to grow, rather than shrink, as more participants join the planning and implementation process. This is true in major rail corridors and facilities projects, such as the Third Street LRT Project, K-Line/Ocean Avenue Project, L-Line Project, to name a few. However, a value-engineering process would be useful to identify items that are proportionally high in cost relative to their benefits, perhaps resulting in some savings. In any case an ample contingency should also be included as part of the project budget.

Section 6.6 – Funding Sources

Many of the funding sources listed in the funding plan are sources that provide funds to Muni or could provide funds to Muni, such as existing Bridge Toll funds, Bridge Toll third dollar increase, and Prop 42 funds. It is difficult to gauge from the information given if providing any of these funds to Transbay Terminal would mean that Muni would receive less funding. It would also be useful to know what funds

would be used to guarantee the TIFIA loans. If any of these funds are funds that Muni could expect to receive, using them as a guarantee could affect Muni's access to the funds. It would be good to have more explanation of these issues in this section.

If you have any questions, please contact Kerstin Magary, Senior Project Manager, at (415) 554-1789, fax: (415) 554-3453.

Sincerely,

José Cisneros
Deputy General Manager for Capital Planning & External Affairs

ATTACHMENTS

cc: Michael Burns, Muni
Lisa Mancini, Muni
Fred Stephens, Muni
Lou Johnson, Muni
Michael Hursh, Muni
Vince Harris, Muni
Gigi Harrington, Muni
Peter Straus, Muni
Kerstin Magary, Muni
Sue Olive, Muni
Duncan Watry, Muni
Jim Lowé, Muni
Amy Brown, Deputy City Attorney
Maria Ayerdi, Mayor's Office

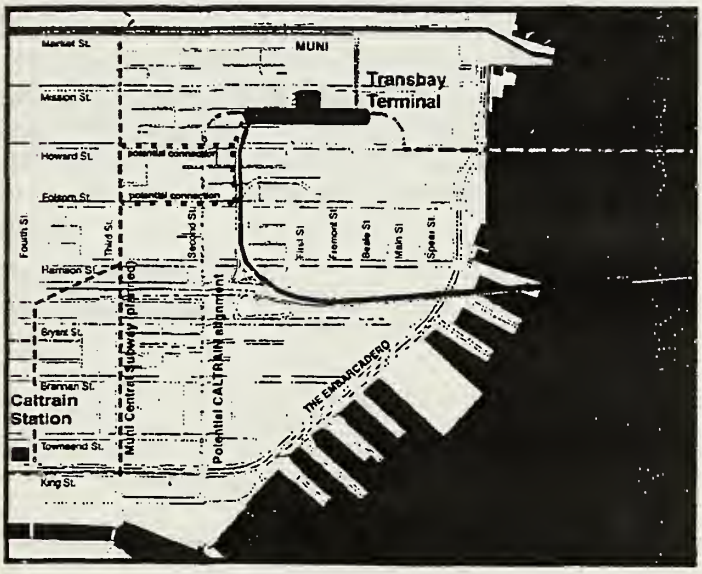
File: Transbay Terminal

Attachment A

Favoring transit in a regional framework

improved connections among public transit services.

Located in downtown San Francisco, the new Transbay Terminal will be the indispensable component of a strategy to solve these problems by providing efficiently linked and greatly expanded bus and rail capacity, more convenient access to transit, and a new celebratory building that is delightful and easy to use—an appropriate new gateway to and from San Francisco. Simultaneously, the terminal will serve as the link between trains using the Caltrain Peninsula lines and trains serving the East Bay, making possible, for the first time, direct rail trips between San Francisco and the great interior of the state. After two years of work by the thirty-member Transbay Panel, under the leadership of MTC, the City of San Francisco, AC Transit, Caltrans and Caltrain, an informed, transit-based, site-appropriate decision has been made with the multi-agency constituent support required to inspire and sustain action. Building upon this resolve, the lead consultants to the Transbay Panel, SMWM, Richard Rogers Partnership, and Ove Arup & Partners have developed an exciting concept that realizes the Panel's vision for a remarkable new regional transportation hub, a building designed to encourage and accommodate new transit ridership, and a memorable public structure that celebrates the energy of arrival in a great American city.



A MULTI-MODAL TERMINAL FOR THE BEYOND

As a truly regional facility, the new Transbay to modern ways of working and lifestyles th Area to become a unified economic and cult ing the various modes of municipal, regiona transportation, the new terminal will bring t ciency to public transit throughout the regic izes the free exchange of ideas and informat

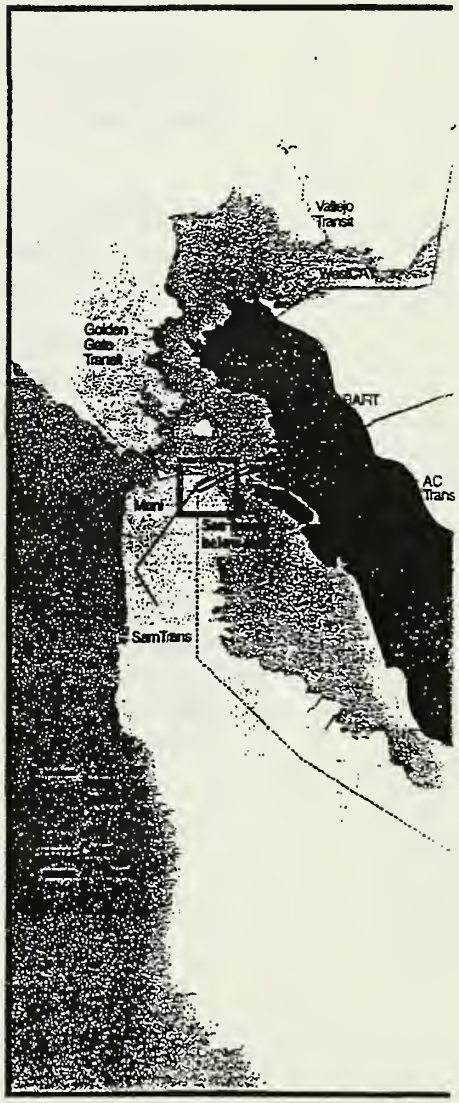


Fig. 1 **Regional commuter transit network** with future connections shown in inset to left.

Attachment B

GEARY CORRIDOR

SYSTEM PLANNING STUDY

FINAL REPORT

PREPARED FOR

SAN FRANCISCO MUNICIPAL RAILWAY

BY **MERRILL & ASSOCIATES**

In Association With

Parsons Brinckerhoff Quade & Douglas
Kiyomura-Ishimoto Associates
Finger & Moy
Manna Consultants
Nelson/Nygaard Associates
Pittman & Hames Associates

APRIL 1995

IV. CONCLUSIONS AND RECOMMENDATIONS

Based upon the results of the Geary Corridor System Planning Study as summarized in Section III above, and as an outgrowth of the ongoing Citywide Fixed Guideway Plan, we have the following conclusions and recommendations:

A. Need for Major Improvement of Geary Corridor Public Transit System. Because of:

- the very high public use of Geary Corridor buses despite the loss of time, reliability and comfort caused by their having to travel in mixed flow traffic lanes;

- the likelihood that the traffic and other adverse conditions which already make Geary Corridor bus travel a relatively frustrating and uncomfortable experience will worsen with time as the San Francisco Bay Region grows; and

- the preference of most of the people attending the 10 public meetings for a major investment which would result in a significant improvement in the reliability and general quality of Geary Corridor transit services

Recommendation No. 1: that subject to the availability of funds, the City move ahead with a major capital investment to improve the Geary Corridor public transit service and that this improvement include significant reduction in public transit trip times as well as significant improvement in public transit reliability and patron comfort.

B. Advancement into the Next Stage. As an outgrowth of comments received during the Public Participation Program, and based upon intensive screening by representatives of the San Francisco Transportation Authority, the City Departments of Parking and Traffic and City Planning, and MUNI as well as by representatives of the Bay Area Rapid Transit District and the Consultant team, the seven options described above were reduced in number and combined into the following four alternatives:

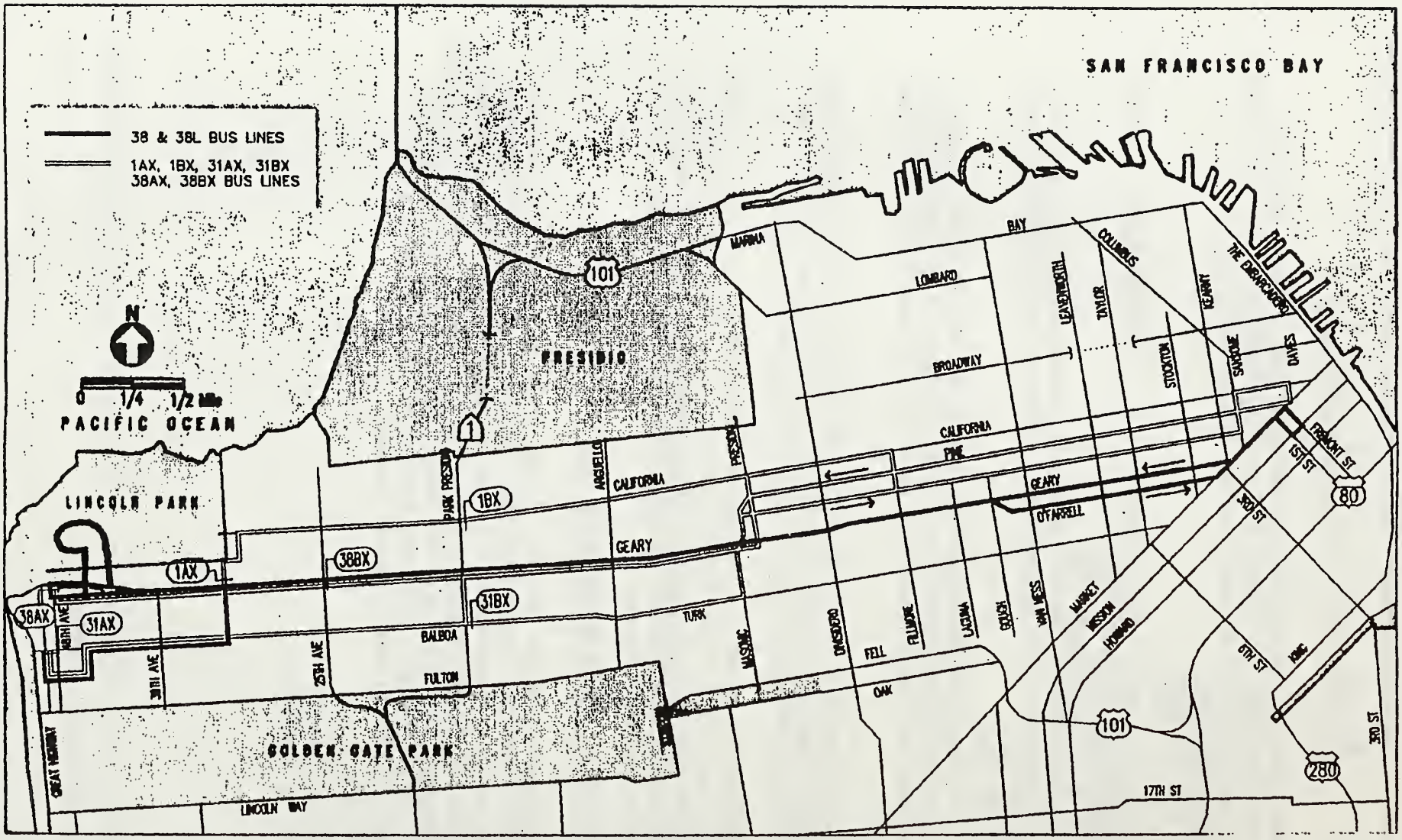


Figure 12A

MUNI GEARY TRANSIT STUDY

Alternative 2 - Partial Subway Light Rail
(Three Downtown Terminal Options)

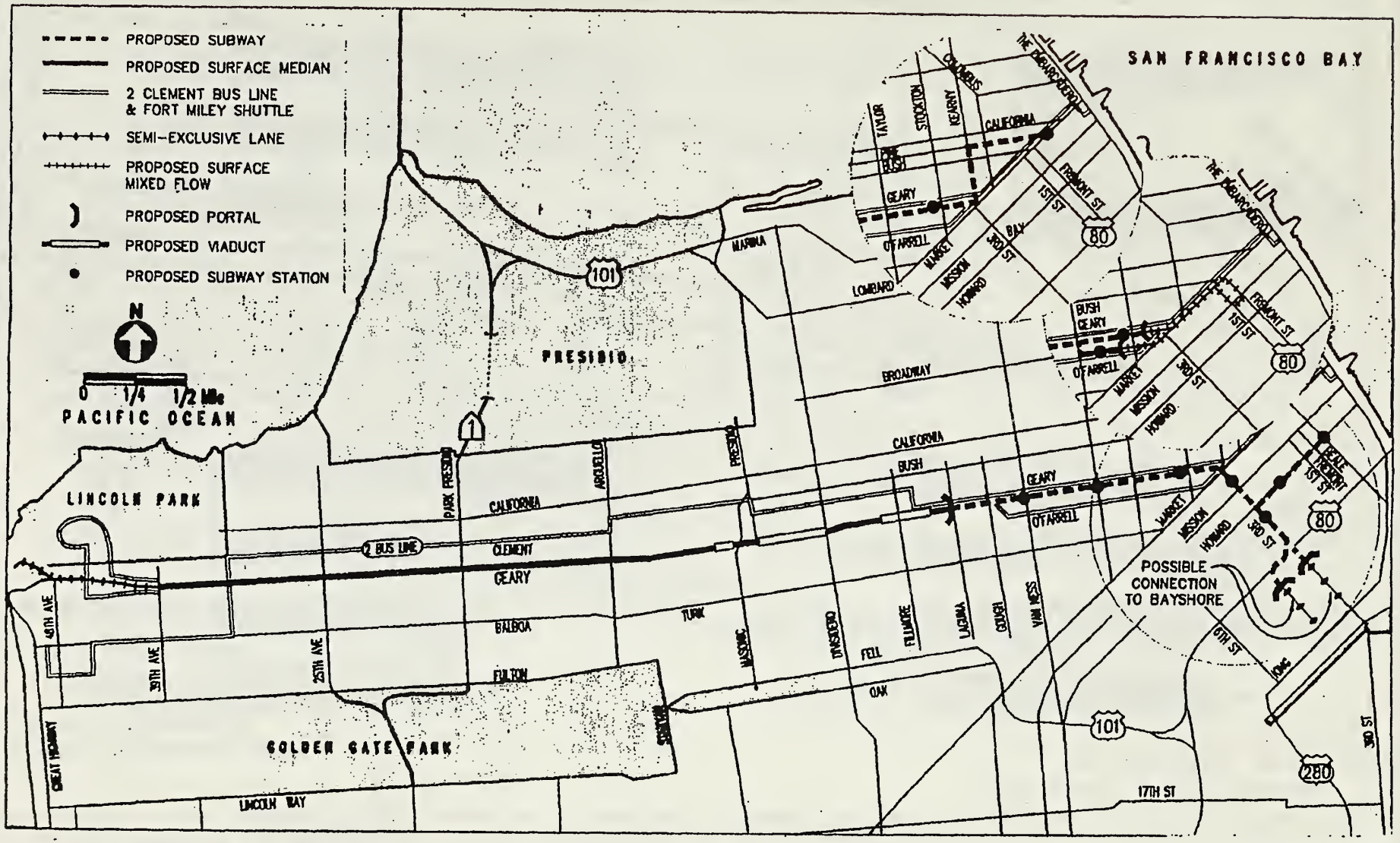


Figure 12B

Alternative 4 - All Surface Light Rail
(Transit Mall between Mason & Kearny)

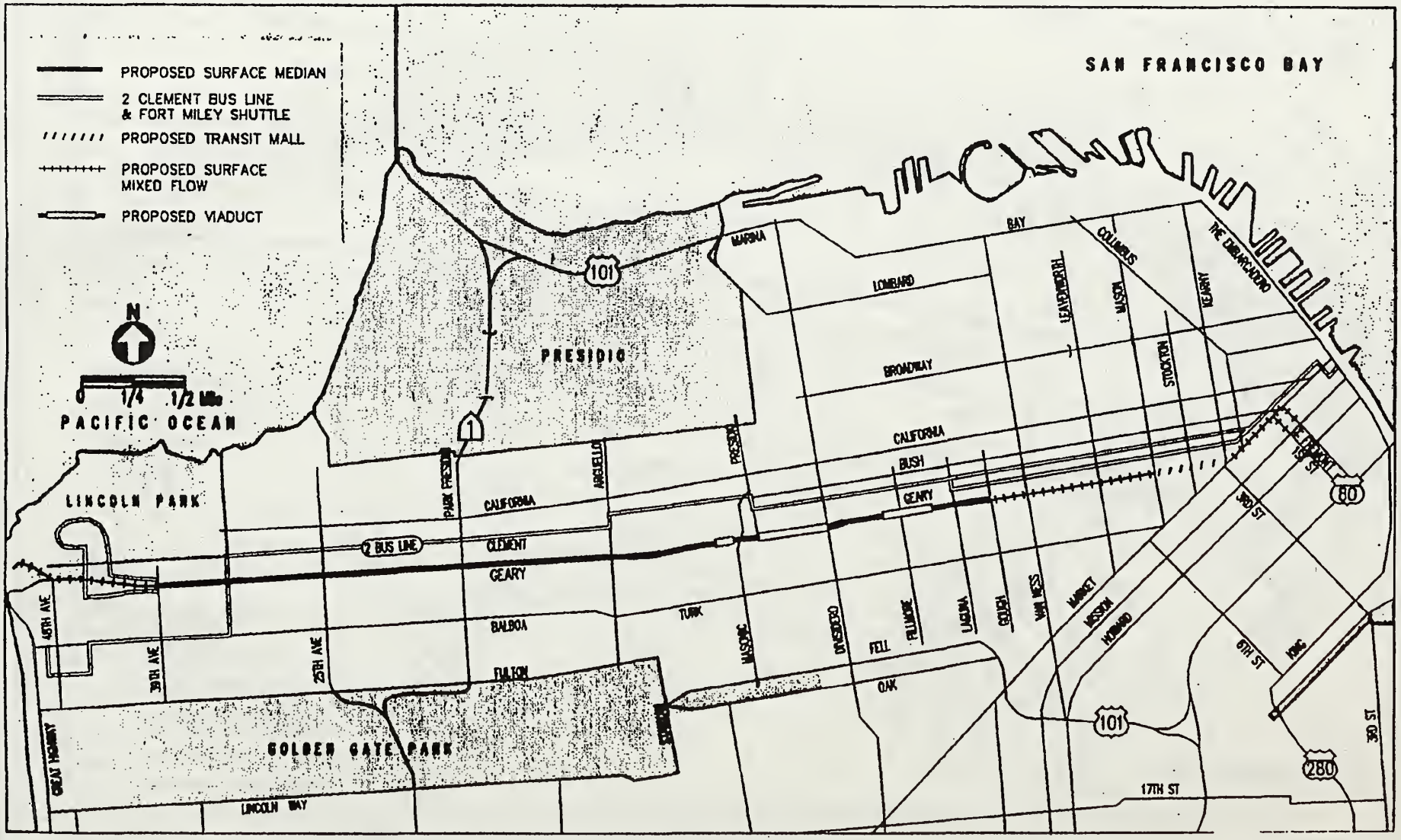
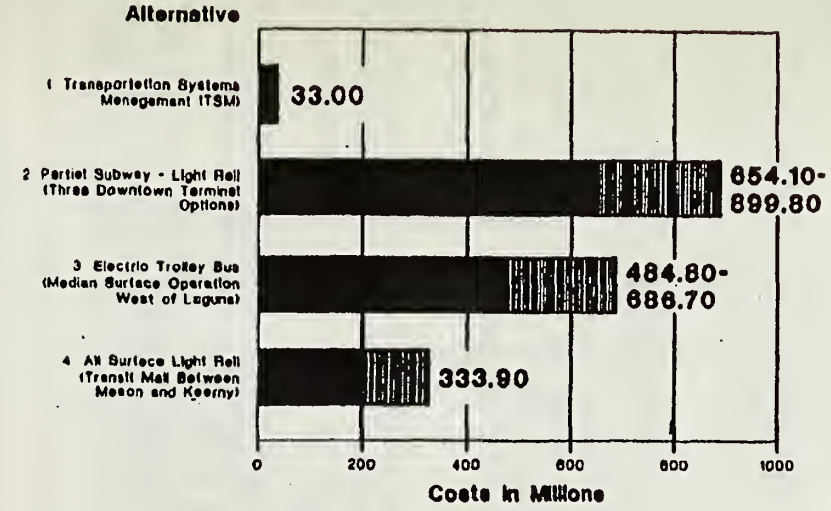
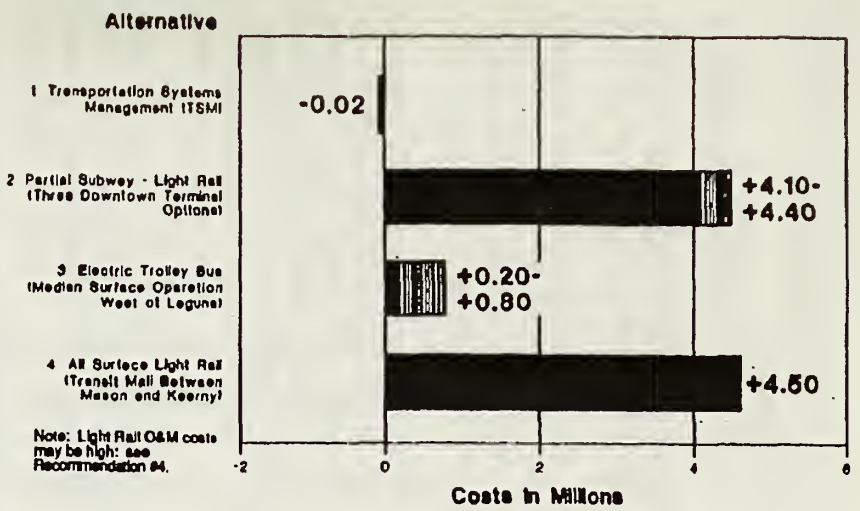


Figure 12D

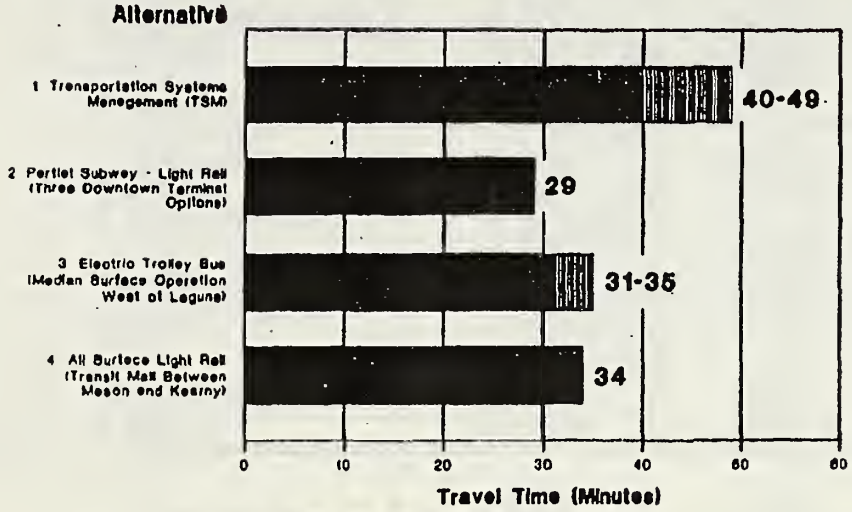
Comparison of Capital Costs



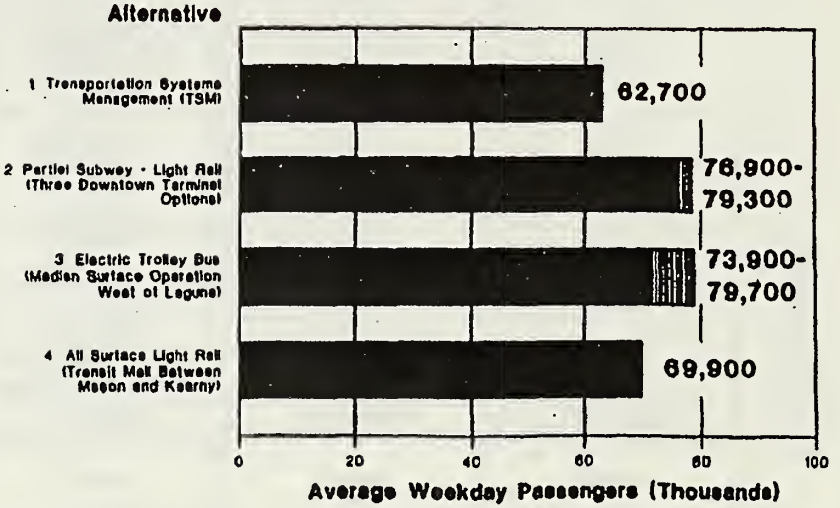
Comparison of Operating Costs



Comparison of Travel Times to Sansome and Market



Comparison of Daily Ridership - Year 2010



MUNI GEARY TRANSIT STUDY

Figure 13

Comparison of Recommended Geary Transit Study Alternatives

Characteristics	Existing (1995)	1 (TSM) (2010)	2 (2010)	3 (2010)	4 (2010)
MODE	Diesel Bus	Diesel Bus	Light Rail	Trolley Bus	Light Rail
Subway Segment	None	None	From Laguna to 3 downtown terminal options	From Laguna or Taylor to Howard/Second	None
Median Operations	No	No	Yes	Yes	Yes
One-Way Route Miles	6.7 38L 6.7 38	6.7 38L 6.7 38	6.4 to 6.6	6.4	6.4
One-Way Travel Time to Sansome/Market (minutes)	40.0 38L 49.0 38	39.5 38L 47.2 38	28.6 to 29.1	30.6 to 34.7	34.3
Headways (minutes)*					
Peak	3.16	2.91	5.82 to 6.00	2.29 to 2.47	6.60
Base	3.60	3.31	6.63 to 6.83	2.61 to 2.81	7.52
Equipment Demand (Peak)	25 38L 24 38	24 38L 23 38	32 to 36	43 to 46	38
Total Capital Cost (millions)***	N/A	$33.0	$654.1 to $899.8	$484.8 to $686.7	$333.9
Change in Net Annual Operating & Maintenance Cost (millions)****	N/A	-$.02	+$4.10 to +$4.40	+$0.20 to +$0.80	+$4.50
Patronage: Daily Boardings on Geary	57,700	62,700	76,900 to 79,300	73,900 to 79,700	69,900

*Combined 38 and 38L services.
**Combined electric trolley bus (ETB) and dual mode (DM) services.
***In 1994 dollars.
****In 1994 dollars, compared to existing.

Table 11

1. Alternative 1 TSM

This alternative consists of two variations; namely the No- Build Alternative and the Transportation Systems Management (TSM) Alternative.

Under a "no-build" alternative, nothing would be done other than to increase the level of existing bus service to keep up with increased patronage. Local policy makers usually want to see what the a no-build condition would cost to help them evaluate the feasibility of the more costly solutions.

Under a TSM alternative as defined in federal guidelines, the existing system would improved through relatively low cost means to render it as efficient and effective as possible. The federal government uses the TSM alternative rather than the no-build alternative as a standard against which to evaluate the feasibility of the more costly "build" alternatives. The federal government wants to see what can be done cheaply before they commit themselves to help pay for more expensive solutions.

There are many gradations of TSM improvement. Virtually anything that can be done to the existing bus service that would speed it up, make it more reliable or safer or more comfortable or easier to understand and use would qualify as a TSM improvement.

TSM improvements affecting the Geary bus lines could include any or all of the following:

- Pre-emption of Traffic Signals: would give transit vehicles priority over other vehicles at crossing points; (opportunities to improve service limited due to heavy cross traffic on many north/south streets).

- Proof-of-Payment System: would feature ticket- dispensing machines on loading islands or nearby sidewalks; would eliminate need for patrons entering Geary buses to pass by operator to pay a fare or show a transfer; would utilize roving inspectors to cite individuals caught without proper proof-of-payment. A proof-of-payment system would offer the significant advantage of speeding up loading by enabling patrons to enter the vehicle by any door at any time.

- Computer-Controlled Traffic Signal System: would have the capability of altering the general traffic signaling system as appropriate to react to predetermined bus priority criteria and varying traffic conditions.

- Gradual replacement of vehicles with low floor vehicles; would speed up loading.

The TSM, as defined for the purposes of this study, involved only the pre-empting of certain traffic signals. As indicated in Figure 13, and in more detail in Table 5A, the TSM Alternative is estimated to cost $33.0 million in 1994 dollars,

primarily to cover the cost of the additional buses needed to carry the additional patronage anticipated because of demographic changes.

2. Alternative 2 Subway Surface Light Rail (with three east end routing options; namely Geary Alternatives 2A and 2B, and an alternative developed as part of the Citywide Fixed Guideway Study featuring a terminal at the foot of Pine or Bush Street).

As described in Section II H, this alternative, under any of the three east end options, features light rail vehicles running in mixed flow traffic from the west end of Geary to 39th Avenue, then in a surface median to Laguna, then in subway to Taylor. From Taylor, the options vary. Options 1 and 2 are Geary Corridor alternatives 2A and 2B. They are described in Section II H and shown in Figure 12B. Option 3 is the Citywide Fixed Guideway Study option. It is also shown in Figure 12B.

Option 1 (Geary Corridor Alternative 2A) would route light rail vehicles on the surface of Market Street. In terms of routing, this option is regarded as doing the best job of taking people where they want to go (given that the employment centroid of downtown San Francisco is located at the intersection of Market and Sansome Streets).

To ensure that rail vehicles could travel expeditiously along the surface of Market Street, it would be necessary to take certain steps to limit the access of private automobiles to lower Market Street (such as preventing southbound Stockton Street automobiles from turning left onto Market).

Option 2 (Geary Corridor Alternative 2B) would route light rail vehicles under Third and Howard to a subway terminal station at Howard and Beale. Under this option, Geary Corridor travelers wishing to reach lower Market Street destinations would have a choice of transferring to a Market Street bus, or walking (partly on mezzanine level moving sidewalks) from Third Street to the Montgomery MUNI/Metro Station, or walking back to Market Street from Howard Street. This option would improve service to the south of Market area.

Option 3 (Citywide Fixed Guideway Study Alternative, with terminal at the foot of Pine or Bush Street) would provide direct access from the Geary Line to the Montgomery Street Station and to Financial District destinations.

As indicated in Figure 13, and in more detail in Tables 5B and 5C, the cost of this package is estimated to range in cost from $654.1 million to $899.8 million in 1994 dollars, depending upon which east end option is selected.

3. Alternative 3 Subway Surface Electric Trolley Bus

As described in Section II H, this alternative features electric trolley buses running in mixed flow traffic from the west end of Geary to 37th Avenue, then in

a surface median to either Laguna (under Alternative 3B) or Taylor (under Alternative 3C), then in subway under Geary, Third and Howard to separate eastbound and westbound portals on Howard, then on the surface of Howard to a terminal at or east of Beale Street.

As indicated in Figure 13, and in more detail in Tables 5E and 5F, the cost of this package is estimated to range in cost from $484.8 million to $686.7 million in 1994 dollars, depending upon whether Geary Corridor Alternative 3C or 3B is selected.

As can be seen from Figure 11, the electric bus alternatives are cheaper to operate and maintain than the light rail alternatives. In addition, because of lower utility relocation costs, the absence of track work, shorter and fewer stations, cheaper vehicles, and a shorter tunnel, the electric trolley bus alternatives are substantially less expensive to develop than the equivalent light rail alternatives. However, trolley coach options have received almost no public support.

Electric Trolley Bus Alternative 3C would be substantially less costly to design and construct than Electric Trolley Bus Alternative 3B; however it would require surface running through the congested section of Geary between Gough and Taylor, with heavy cross traffic interference at Franklin, Van Ness, Polk, Larkin and Hyde.

4. Alternative All-Surface Light Rail

As described in Section II H, this alternative features light rail vehicles running in mixed flow traffic from the westerly terminal to 39th Avenue, then in a surface median to Gough, then in traffic to the east end of the line at either the Transbay Terminal or the foot of Market Street. (A variant of Alternative 4 would be to operate using electric trolley buses rather than light rail.)

As indicated in Figure 13, and in more detail in Table 5G, this alternative (assuming light rail operation) is estimated to cost $333.9 million in 1994 dollars, significantly less than any of the subway/surface alternatives.

To ensure that rail vehicles could travel expeditiously along the surface of Market Street, it would be necessary to take certain steps to limit the access of private automobiles to lower Market Street (such as preventing southbound Stockton Street automobiles from turning left onto Market).

One major concern with the all-surface rail alternative is that to provide expeditious and reliable transit service along the surface of Geary between Gough and Market, it will be necessary to make a series of far reaching street changes including shifting the entrance of the Union Square Garage from Geary to Post, diverting cars from Geary at several points (thus changing the Market-to-Gough section of Geary from an arterial to a local street), and converting Post from an eastbound arterial to a westbound arterial. Yet without significant street changes, the quality of rail service along the Market-to-Gough

section would be insufficient to justify the cost of developing a surface light rail alternative.

Recommendation No. 2: that on behalf of meeting the objectives of Recommendation 1, the four packages described above be advanced into the next (Major Investment Study) phase of the federal implementation and funding process.

C. Patronage Forecasting. Projecting public transit patronage in San Francisco has been hampered for many years by the limited applicability of the Metropolitan Transportation Commission's (MTC's) forecasting model to this city.

At various times, various city departments have called for San Francisco either to work with MTC to better adapt the MTC model to San Francisco, or to develop a separate City of San Francisco model.

In any event, an accurate means of forecasting future public transit patronage is badly needed as a tool for evaluating the various public transit fixed guideway systems currently under consideration.

Recommendation No. 3: that a sophisticated patronage forecasting model that can be accurately applied to San Francisco County be developed forthwith.

D. Costing Methodology. Each year MUNI submits a Section 15 Report to the Federal Transportation Administration delineating MUNI's annual operating and maintenance (O&M) costs. MUNI's 1993 costs as set forth in the latest Section 15 Report formed the basis of the Geary Corridor O&M cost estimates. During the course of the Geary study a concern arose over the accuracy of the Section 15 Reports.

Recommendation No. 4: that MUNI conduct an independent analysis of the Section 15 Report and make methodology adjustments as appropriate.

E. The BART Regional Alternative. Pursuant to a resolution adopted by the BART Board of Directors on July 14, 1994, the effect of a regional BART Geary regional line on four of the proposed Geary Corridor MUNI lines was evaluated. The results of this BART-sponsored effort were set forth in a separate report entitled "The BART Regional Alternative: Its Effect on MUNI". Based upon the results of the BART study, it was concluded that:

- constructing a Geary branch of the BART system from Market Street, through the Geary Corridor to approximately Seventh Avenue, where BART would

leave the Geary Corridor, would be insufficient to meet the needs of many Geary Corridor travelers, and therefore would not preclude the need for a separate MUNI fixed guideway system designed to improve Geary Corridor transit services;

- regional rail lines linking Northbay counties to San Mateo County and the Eastbay counties could create significant travel opportunities for public transit users and are therefore deserving of further study; and

- additional data and analysis are needed to fully identify the routing, feasibility, and patronage which could be generated by providing additional regional rail transit services in the Westbay and Northbay Counties.

Recommendation No. 5: that if BART is interested in improving regional transit connections on the north and west sides of San Francisco Bay, that it initiate a more definitive study designed to find the best way of extending its system, or otherwise serving the areas not now adequately served by BART.

Attachment C

SAN FRANCISCO MUNICIPAL RAILWAY
425 MASON STREET, 6th FLOOR, SAN FRANCISCO, CA 94102
(415) 923-2626 FAX (415) 923-2620

Memorandum

MAINTENANCE DIVISION
MUNICIPAL TRANSPORTATION AGENCY
MAR 1 4 2001
Kerstin F. Magary
RECEIVE

To: Rod Mc Millan

From: Walt Streeter

Date: March 13, 2001 By Fax (510) 817-3299 and US Mail

Re: Estimates for Operating and Capital Costs Associated with Changes to Muni Tracks, Overhead, and Operator Facilities at the Interim Transbay Bus Terminal and the 1-California Terminal on Beale Street

---

The purpose of this memo is to provide the Metropolitan Transportation Commission with additional estimates of the Muni operating and capital costs associated with the Interim Transbay Bus Terminal

Operating Costs: We estimate the additional annual operating and maintenance costs associated with the Interim Bus Terminal at just under $1 million in FY 2000 dollars. These costs are for added service on the 2, 5, 6, and 38/38L lines per the attached memo from John Katz.

Capital Costs: We estimate the total capital cost associated with the interim terminal at $5.7 million. This cost includes new trolley overhead, strain poles, and special work. It also includes the provision of a temporary street supervisor's office at the interim bus facility and a temporary operator's restroom for the 1-Calfornia trolley coach line at its terminal on Beale Street. The existing 1-line restroom on Howard Street will need to be removed when the Interim Transbay Bus Facility is constructed. The terminal should also provide space for street supervisors and maintenance personnel to park their trucks.

The capital cost estimate, per the attached memo from Bill Neilson, should replace the previous capital cost estimate. It is a conceptual cost estimate that will be refined when the facilities are further developed.

Thank you for MTC's and the Transbay Terminal consulting firm's help in accommodating Muni operating requirements. Please let us know if you need further information on the cost estimates or Muni operations.

cc: J. Eddy, T. Bruzzone, B. Neilson, K. Magary, J. Katz, S. Olive, W Streeter

CONSTRUCTION DIVISION • PUBLIC TRANSPORTATION DEPARTMENT

1145 Market St., 5th Fl. • San Francisco, CA 94103 • (415) 554-0785 • Fax: (415) 554-3217

TO: Kerstin Magary

FROM: John Katz

DATE: February 7, 2001

RE: **Interim Transbay Terminal - Operating Costs**

Following is an estimate of the increase in MUNI's operating costs to serve the interim Transbay Terminal between Beale / Main/ Folsom/ Howard. The estimate, as calculated below, results in an annual increase in MUNI's operating and maintenance costs of just under $1,000,000 a year in FY 2000 dollars.

In computing the costs the key variable is the additional round trip time required to service the interim terminal compared to the existing facility at First and Mission. The computation of that time was arrived at doing real time drive-through simulations from the common point of both terminal loops, which is inbound at Market and First, outbound at the Fremont and Market boarding island.

Based on these simulations and average traffic conditions (mid-day on a weekday), the additional round-trip time required to go to the interim terminal location was **250 seconds (or 4 minutes, 10 seconds)**. For purposes of this calculation the time will be rounded off to 4 minutes. This time calculation assumed no stops between First and Market and the interim terminal, no special traffic pre-emptions at intersections not directly at the new terminal, and the completion of the construction project on First St. between Market and Howard. Also the contra-flow lanes in the interim terminal could not be exactly simulated, but a time was estimated for these movements based on drive-throughs of the same blocks in their current allowed directions (without stoplights).

Further Assumptions

- The effected lines are the 5-Fulton, 6-Parnassus, 2-Clement, 38/38L-Geary
- Trip times for the 1-California and 41-Union will not be effected
- Current schedules and layover times are assumed
- FY 2000 costs are assumed

Methodology

The methodology used in this calculation is based on the total hourly costs to MUNI of operating a vehicle in the effected mode (excluding administrative costs). MUNI's experience is that in the long run this is the most accurate estimate of actual increased or decreased operating costs for route changes. Therefore no attempt was made to calculate the impacts by line on the total number of vehicle runs that would be needed. However, it is fairly clear that additional vehicles will be needed on the 38-Geary and 5-Fulton to maintain current peak headways on those lines.

Calculation

Line	Increase in round trips / yr. x 4min/ 60	= hrs./year	x	mode cost/hr	= cost/yr
38/38L Geary	87, 847 x 4 /60	= 5, 856	x	(60'MC)$88	=$515,328
5-Fulton	5, 904 x 4/ 60	= 2, 393	x	(40'TC) $83	=$198,619
6-Parnassus	1, 245 x 4/ 60	= 2, 083	x	(40'TC) $83	=$172,889
2-Clement	16, 307 x 4/ 60	= 1,087	x	(40'MC) $80	=$ 86,960
		Total annual incremental costs			= $973,796

If the interim terminal would be in operation for three years, the total increase in MUNI's operating and maintenance costs would be $2,921,388.

When MUNI's terminal operation moves to the proposed new terminal between Beale and Fremont south-of-Mission a very rough estimate of the increased costs (compared to the existing configuration) would be 35% of this figure, or about $340,828 annually.

cc: Sue Olive
Dan Rosen
Patty DeVlieg
Peter Straus

SAN FRANCISCO MUNICIPAL RAILWAY
CAPITAL IMPROVEMENT PROJECT ESTIMATE

PROJECT NO. _____ **TITLE:** Transbay Terminal Temporary Overhead Contact System

CLIENT LIAISON: Kerstin Magary

SCOPE OF WORK:

Install new trolley wires along Beale Street between Howard Street and Folsom Street, along Folsom Street between Beale Street and Main Street and along Main Street between Howard Street and Folsom Street
Install new strain poles along Beale Street, Folsom Street and Main Street
Install new duct bank along Beale Street and Main Street between Mission Street and Howard Street
Special work at Mission Street and Fremont Street
Special work at Howard Street and Beale Street
Special work at Folsom Street and Beale Street
Special work at Folsom Street and Main Street
Special work at Howard Street and Main Street
Adjustment of existing trolley wires along Mission Street and Market Street
Install / remove temporary street supervisor's office
Install / remove temporary operator's restroom for the No. 1 California

ESTIMATE:

1	Muni Construction Division (MCD) services		
	a) Project Management	3.0% of construction cost =	$ 70,000
	b) Engineering Services	17.0% of construction cost =	$ 380,000
	c) Construction Management	10.0% of construction cost =	$ 220,000
	d) Other direct expenses (Reproduction, Revolving fund)	4% of construction cost =	$ 90,000
		TOTAL MEC	$ 760,000
2	Other Services		
	a) Muni Operations and Maintenance		$ 200,000
	b) DPW BOA work orders		$ -
	c) DPT work orders		$ 50,000
		TOTAL OTHER SERVICES	$ 250,000
3	CONSTRUCTION COST		$ 2,220,000
4	CONTINGENCY	75% of items 1, 2, and 3 =	$ 2,430,000
		TOTAL PROJECT ESTIMATE (2000 Dollars) ...	$ 5,700,000
		SAY ...	$ 5,700,000

APPROVED:

W. Nelson 3/2/01

Muni Construction Management Date

TransbayCIP3
3/2/01

SANTA CLARA
Valley Transportation Authority

RECEIVED
DEC 03 2002
PLANNING DEPT

November 25, 2002

City of San Francisco
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Attention: Paul E. Maltzer, Environmental Review Officer

Subject: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

Dear Mr. Maltzer:

Santa Clara Valley Transportation Authority (VTA) staff have reviewed the DEIS/DEIR for the Transbay Terminal/Caltrain Downtown Extension/ Redevelopment Project. The project would be located in Downtown San Francisco and has three major components:

- A new, multi-modal Transbay Terminal on the site of the present Transbay Terminal,
- Extension of Caltrain from its current San Francisco terminus at Fourth and Townsend Street to a new underground terminus underneath the proposed new Transbay Terminal
- Establishment of a Redevelopment Area Plan with related development projects, including transit-oriented development on publicly owned land in the vicinity of the new Transbay Terminal.

VTA is one of the three member agencies that provide operating and capital funds for Caltrain service. In this role, we are impacted by actions that result in increased Caltrain costs. Therefore, our first several comments relate to the proposed financing plan for the project or related elements. We have the following comments:

1. The electrification of Caltrain is a prerequisite for the Downtown Extension. Statements made on page 2-3 indicating otherwise, contending that dual mode locomotives could be procured to operate service on the downtown extension in the absence of electrification, at an additional cost of $235 million (in 2002 dollars), raise concern because:
    a. The Caltrain electrification project, which is still under environmental review, does not include dual mode locomotives as an option.
    b. No source of funds is identified for purchasing the dual mode locomotives or any associated increase in operations and maintenance costs. Given current economic conditions it is unlikely that the estimated $235 million increment to purchase these locomotives will be available from Caltrain, its member agencies or the State within the projected project development schedule.

3331 North First Street · San Jose, CA 95134-1906 · Administration 408.321.5555 · Customer Service 408.321.2300

2. Funding and schedule assumptions regarding the electrification of Caltrain (e.g. assuming electrification between San Francisco and Gilroy will be implemented by 2006, assuming that electrification will be funded entirely with local sources) are very optimistic given the current status of the electrification project. A funding plan with committed resources has not yet been developed or endorsed for Caltrain electrification by the three Caltrain Joint Powers Board member agencies, who are each responsible for one third of the project costs. VTA, who has funding for our share of electrification in Measure A of 2000 (the extension of our current sales tax that begins in 2006) has consistently indicated that these funds will definitely not be available prior to 2006 and it is highly unlikely that VTA funds will be available for the project prior to 2016.

3. It appears that the project sponsors assume that the State of California-owned land required for the Transbay Terminal project, worth approximately $300 million, will be provided to the City and County of San Francisco by means of an administrative transfer at no cost to the project sponsors. The final document should address this assumption and the status of the property acquisition.

4. The statement on page 6-6 that Caltrain anticipates operating 120 trains a day is very optimistic, given the current economy in the Bay Area. The current Caltrain service level of 76 weekday trains (a decrease from the 80 weekday trains in the previous year) is not expected to increase significantly between now and the estimated completion of the Transbay Terminal.

5. The financial analysis in Chapter 6, particularly the funding source assumptions in Section 6.6 and as illustrated in Table 6.6-1, shows that the majority of funds needed for the project have not been secured, with most of the funding programs and the associated levels of funds not within the control of the project sponsors. The revenue assumptions are also very optimistic in terms of the amounts of funds and the schedule of their receipt. The FEIS should include a more detailed funding plan.

6. For the 2020 no action alternatives and project conditions, was the BART to Santa Clara extension assumed in the project network? If the BART to Santa Clara extension project was not included, how would ridership for the no project and project change if BART to Santa Clara is assumed?

7. Please provide a description of the ridership-forecasting model that was used to produce the station-level CALTRAIN ridership estimates. In particular, describe consistency or inconsistency with the latest MTC regional models.

8. In Table 3.1-14, under the 2020 Extension to the Transbay project alternative column, which land use assumptions are used for ridership estimates? Are these ridership estimates under 2020 cumulative conditions?

9. Please provide the 2020 cumulative scenario estimates for Caltrain system ridership if not already included in Table 3.1-14.

10. No mention of CALTRAIN system impacts outside of San Francisco are disclosed for either Santa Clara County or San Mateo County stations in the 2020 project or cumulative scenario conditions. For example, the document should identify project impacts such as park-and-ride space demand, platform capacity, and other impacts at existing core stations, particularly since ridership is shown to increase for virtually every station on the system. In addition, no increases beyond 170 trains are assumed for the no-project and project alternatives, yet ridership is estimated to increase substantially over levels estimated for the no-project. A description needs to be provided on the peak trainload impacts caused by the project alternative.

11. It should be explained why ABAG Projections 1998 forecasts were used for year 2020 ridership estimates as opposed to the most recent regionally-adopted ABAG Projections 2000 forecasts.

We appreciate the opportunity to review this project. If you have any questions, please call Somruthai Michelutti of my staff at (408) 321-5785.

Sincerely,

James E. Pierson
Planning and Development Director

JEP:SCM:kh

cc: John McLemore, Caltrain JPB Vice Chair
Manny Valerio, VTA Board of Directors
Ken Yeager, VTA Board of Directors
Mike Evanhoe, VTA
Carolyn Gonot, VTA
Jim Lightbody, VTA
Frank Sharpless, VTA

VI. Associations and Organizations

RECEIVED
DEC 27 2002
PLANNING DEPT

BayRail Alliance
formerly Peninsula Rail 2000
3921 East Bayshore Road, Palo Alto, CA 94303 toll-free tel. (866) 267-8024

December 20, 2002

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Dear Mr. Malter:

BayRail Alliance, a rail transit riders' group consisting mostly of Caltrain riders, wishes to submit the following comments on the draft Transbay Terminal EIS/EIR. We are strong supporters of the Transbay Terminal project, and we feel that it is one of the most exciting public transportation and land use projects in the United States. However, we have specific concerns about the proposed plans that we ask you to consider.

Summary of our Recommendations:

Build a new terminal and rail extension that can accommodate the next fifty years of growth for rail and bus transit in the Bay Area and California.

- The downtown extension configuration must be modified to accommodate high speed rail. Pursue a modified 2nd-to-Mission alignment, rather than the 2nd-to-Main alignment, as the preferred alternative for the downtown extension. Platform and track design must be modified to include more and longer platforms, with fewer path conflicts, to provide for efficient and successful operation of high speed rail on shared tracks with local service.

- It is imperative to grade separate the two street crossings in the Mission Bay area (16th Street and Common Street) as part of the DTX project, as these grade separations will become difficult, if not impossible to construct, once the extension becomes operational.

- Track configuration can be improved. The number of platforms should be increased and path conflicts reduced. Track alignments should be improved to lessen tight curvatures, while impacting fewer buildings.

- Perform value engineering to identify ways to phase construction of less essential portions of the project to reduce required debt service.

- Contain overall project cost by eliminating or postponing construction of underground tail tracks and storage yards and the underground pedestrian connection to Market Street; and by avoiding cut-and-cover construction wherever feasible.

- We strongly support the full build, West Ramp alternatives and bus storage facility location.

Rail Platforms and High Speed Rail

While platform lengths presented in the DEIS/DEIR are substantially longer than what is required for conventional commuter trains, they do not provide sufficient capacity for HSR. In Europe and Japan, it is common to run HSR trains that are 14 or 16 cars long (400m/1312ft design standard), and even with this extra length, there has been a movement toward double-decked trains to provide sufficient seating capacity.

Currently, only the 2nd-to-Main alignment option has platforms long enough to accommodate HSR. However, the highly curved platforms in the 2nd-to-Main alignment are seriously flawed and ineffectual in their intended purpose of serving the extra long trains needed for HSR. The proposed curvature would result in unacceptably long gaps between train doors and platforms.

We ask you to examine other options for providing optimum platform length for high speed rail. We believe the 2nd-to-Mission alignment can be improved substantially to achieve this goal. Richard Mlynarik and Michael Kiesling have outlined a design alternative that will permit longer platforms (see attached Figure 1). We also believe that the number of platforms can be increased. For example, see Figure 2, attached.

Long platforms have the advantage of providing storage space for two conventional trains end-to-end until tail tracks are constructed at a later phase.

Improve Track Configuration

We also believe it is possible to add tracks and platforms relatively inexpensively at the stations to increase efficiency of operations. Keeping in mind the long service life of the terminal and future needs, we ask that you modify the design to provide as many operating tracks and platforms as will fit on the site to be installed. For example, see the attached designs by Richard Mlynarik.

We have concerns about the flexibility of operations allowed by track approaches into the platforms. For example, in figures 2-2.15 and 2-16 of the DEIR, the four northernmost tracks feed into a single approach track. This greatly constrains train movement into or out of the station. We ask that you redesign track approaches to reduce such path conflicts, and we believe an improved design is possible.

While extensive modeling of bus capacity performed as part of the MTC Transbay Terminal Improvement Program, informed the design of the bus terminal configuration, it doesn't appear that there has been any capacity modeling done for rail operations into the terminal. We believe such modeling will show the need for a more flexible approach-track configuration.

Reduce Impacts to Multistory and Historic Buildings

At several places along the proposed route, we see opportunities to reduce costs and community impacts by adjusting the alignments to impact fewer buildings.

For example, the proposed curvature of the tunneled track alignment near 7th and Townsend is the same as that of the existing surface tracks which currently forces trains to a crawl. This curve needs to be made less sharp to permit speedier train movement. At the other curves (at Townsend/2nd and between 2nd and the Terminal), we believe that it is possible to make small adjustments to the alignments to reduce their curvature while impacting fewer buildings, where these do not impact long-term operational flexibility.

For example, see Figure 3, attached

Grade Separations

16th Street and Common Street

We feel that it is of paramount importance to extend the scope of the study a few blocks south, and to include a grade separation at 16th Street. To serve future Mission Bay developments, MUNI is contractually obligated to operate the 30-Stockton trolley bus at sub-5 minute headways across the Caltrain line via Sixteenth Street and to operate the 45-Union trolley at sub 10-minute headways across the Common Street crossing. This will pose substantial technical problems with the crossing of trolley and Caltrain overhead wires, and traffic delays will become completely unacceptable as Caltrain service levels increase.

The downtown extension must allow 16th Street to be grade separated, and it would be most desirable to complete this at the same time as the rest of the project. It may not be possible to do so later and even if it were possible, will be much more costly and disruptive to Caltrain service.

Common Street

We also feel it is desirable to grade-separate Common Street. We are aware that grade separation was deemed infeasible in an earlier study, and that the CPUC approved an at-grade crossing at Common Street in an earlier decision (across 2 tracks and a Union Pacific siding). Nevertheless, it is highly unlikely that the CPUC would grant approval for a grade crossing across four active tracks. For example, the CPUC recently expressed strong opposition to Caltrain's request to construct an at-grade crossing across four active tracks at Sunnyvale Avenue in Sunnyvale.

By beginning the tunnel for the Caltrain downtown extension at a more southerly location, it should be possible to grade-separate Common Street.

We suggest cost savings below that will offset the cost of constructing these grade separations.

Containing Overall Project Cost

We believe that it is important to reduce the capital cost of the initial terminal construction to the lowest possible, viable amount to reduce interest expenses. Because the Transbay Terminal project will obtain substantial revenues through its Passenger Facility Fee, it makes sense to defer some elements of the project until higher passenger volumes can help pay for them.

- We recommend that you eliminate, or postpone building, the massive, below-ground-level train yard at Seventh and Townsend Streets. The storage space it would yield does not justify its exorbitant cost. In lieu of expensive underground stub-end tracks that can only be used for storage, we recommend building additional through tracks (i.e., four tracks south of the Mission Bay station as far to Sixteenth Street) to provide both additional operating flexibility (at peak congestion times) and off-peak train storage space.

  Future operating scenarios will result in relatively fewer trains requiring mid-day storage. Money would be better spent excavating a much smaller amount of fill to create a Caltrain tunnel at Sixteenth and Common Streets to allow for grade-separated street crossings.

- We recommend that you engage in value engineering to determine elements of the plan, which can be constructed at a later date without sacrificing required near-term operational flexibility or incurring large "retrofit" expenses. These elements should be designed but left unconstructed.

  One example of this is the tail tracks, which can be constructed at a later phase and funded as the need arises, since they are not required for the level of service planned near term. However, tail tracks should be designed into the plan, and any necessary rights-of-way and easements acquired if necessary. We estimate this will save $100-$150 million in immediate construction costs, and more when debt service is included.

- Similarly, postpone constructing the underground pedestrian connection to BART. We ask that it be included in the project design, but this connection can be built at a later date when pedestrian volumes at the terminal increase.

- Cut-and-cover construction should be avoided where it would directly displace multi-story structures or busy roadways such as Second Street; otherwise it can be employed in some locations to reduce costs. We support tunneling, which the DEIR/DEIS indicates will be cheaper and faster than cut-and-cover construction, and which will minimize neighborhood disruption and opposition to the project.

Bicycle Accommodation

The projected number of bike parking spaces required at the Transbay Terminal, 105, is extremely low. The Palo Alto Caltrain station, for example, has approximately 400 class 1

bike parking spaces (open-air racks), 3 dozen class 2 spaces (bike lockers) and 90 class 3 spaces (bike parking spaces monitored by staff).

On-board bicycle accommodations will be limited to 32 spaces with the new Baby Bullet cars even as demand grows. Bicycle-riding Caltrain patrons have long complained about the problem of "bumping", or being unable to board a train that is already full of bikes. The problem has been exacerbated by lack of secure bike parking at stations.

It is much easier to provide additional bicycle facilities at the station than to expand on-board bicycle capacity. It is highly desirable to encourage bicycling in lieu of driving to the station, to reduce automobile congestion in the vicinity of the station. It is also as much as ten times cheaper to provide bike parking than automobile parking.

The Nakano train station in Tokyo has a staffed bike parking garage which accommodates over 3600 bikes in a double-decker, two-story structure, and it is regularly 80% full. Over 55 train stations in Japan have bike parking facilities which have capacity for more than 2000 bikes. Similarly, many train stations in Europe have bike parking facilities which accommodate from 300 to 3000 bikes, depending on passenger volume at the station. For example, Munster station has bike parking for 3,000 bikes; Rheine, 1500; Oldenburg, 1500; Bremen, 500; and Hannover, 350. (see Figure 4)

The world-class, high-volume Transbay Terminal is sure to see much greater bicyclist patronage than the smaller Palo Alto station does today. We ask that you greatly increase the amount of bike parking at the Transbay Terminal, and include provisions for a staffed bikestation.

Transbay Terminal Bus and TOD Components

We support the Full Build alternative to take advantage of this transit-rich, prime location. This project provides one of the most phenomenal opportunities for transit-oriented development in the country, and its potential should not go to waste. The affordable housing component will be a significant boost to San Francisco as well.

We also request that the redevelopment area be extended beyond the present boundaries to include additional parcels that will obviously benefit from the project. This includes

- The block between First, Second, Mission and Minna. It is immediately adjacent to the terminal, contains a large number of fragmented parcels, and is ripe for development.

- The Cornerstone project and 524 Howard, which are holes within the redevelopment area within the present terminal bus ramps on which construction has not proceeded. Should redevelopment take place on these parcels in the future, it will be in no small part due to the appeal and utility of the Transbay Terminal facility, and so it is appropriate for these to contribute to the overall redevelopment plan.

On the bus side, we support the West Ramp alternative because it provides adequate capacity and a well-thought-out operating plan while increasing the amount of land available for

transit-oriented development. We also support the bus storage area under I-80 as it elegantly meets bus operational needs and it will improve a blighted area.

Comments on "Environmentally Superior Alternative"

We take issue with the description of the "Environmentally Superior Alternative" on page S-27 of the report, which obscures the differences between the 2nd-to-Main Caltrain alignment and the 2nd-to-Mission alignment. We concur that the Full Build, West Ramp, Tunneling options are superior to the Reduced Scope, Loop Ramp, Cut-and-Cover options; however we believe that the characterization of the 2nd-to-Main alignment as "fully meet[ing] the purpose and need for the project" is false because we don't believe it provides sufficient accommodation for HSR. The purported benefits of the 2nd-to-Main alignment are marginal compared to the 2nd-to-Mission alignment as proposed in the DEIR/DEIS.

We believe that it is possible to make adjustments to the 2nd-to-Mission alignment which will clearly establish it as the environmentally superior alternative that results in the fewest business and residence relocations and impacts the fewest historic buildings, while fully meeting the purpose and need for the project. In addition, we note that the Mission Street rail alignment eliminates the need for a third of the tunnel by virtue of extending the train mezzanine level to the corner of Mission and Beale; that savings should be taken into account in the rail alignment alternative analysis.

Thank you for your consideration of these comments.

Sincerely,

Margaret Okuzumi

attachments:
- Figure 1: http://www.sonic.net/~mly/tmp/deis/kiesling.pdf
- Figure 2: http://www.sonic.net/~mly/TTT-2001-02-28/o9.ai.pdf
- Figure 3: http://www.sonic.net/~mly/tmp/deis/townsend.pdf
- Figure 4: picture of interior of bike parking garage in Europe

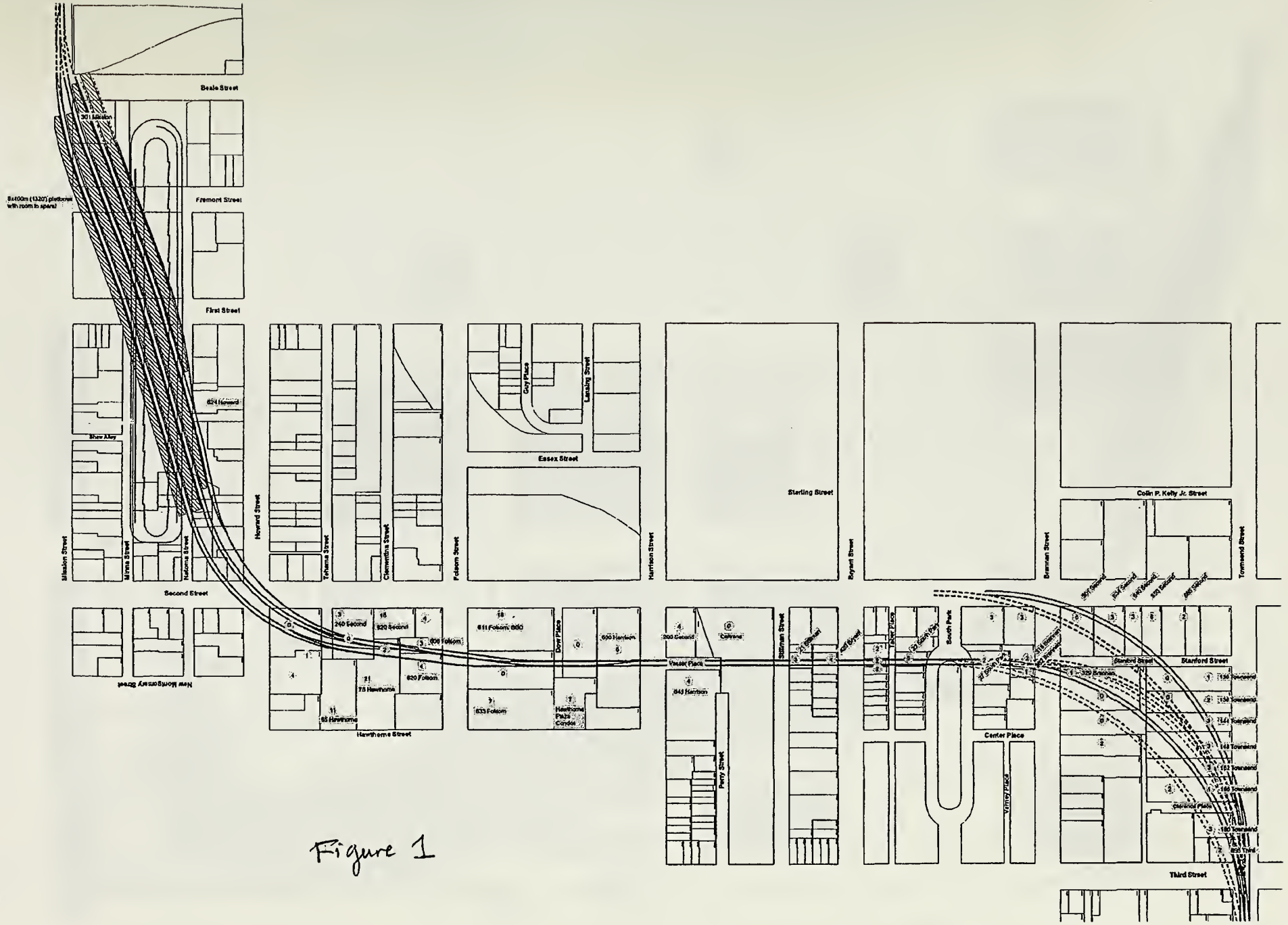
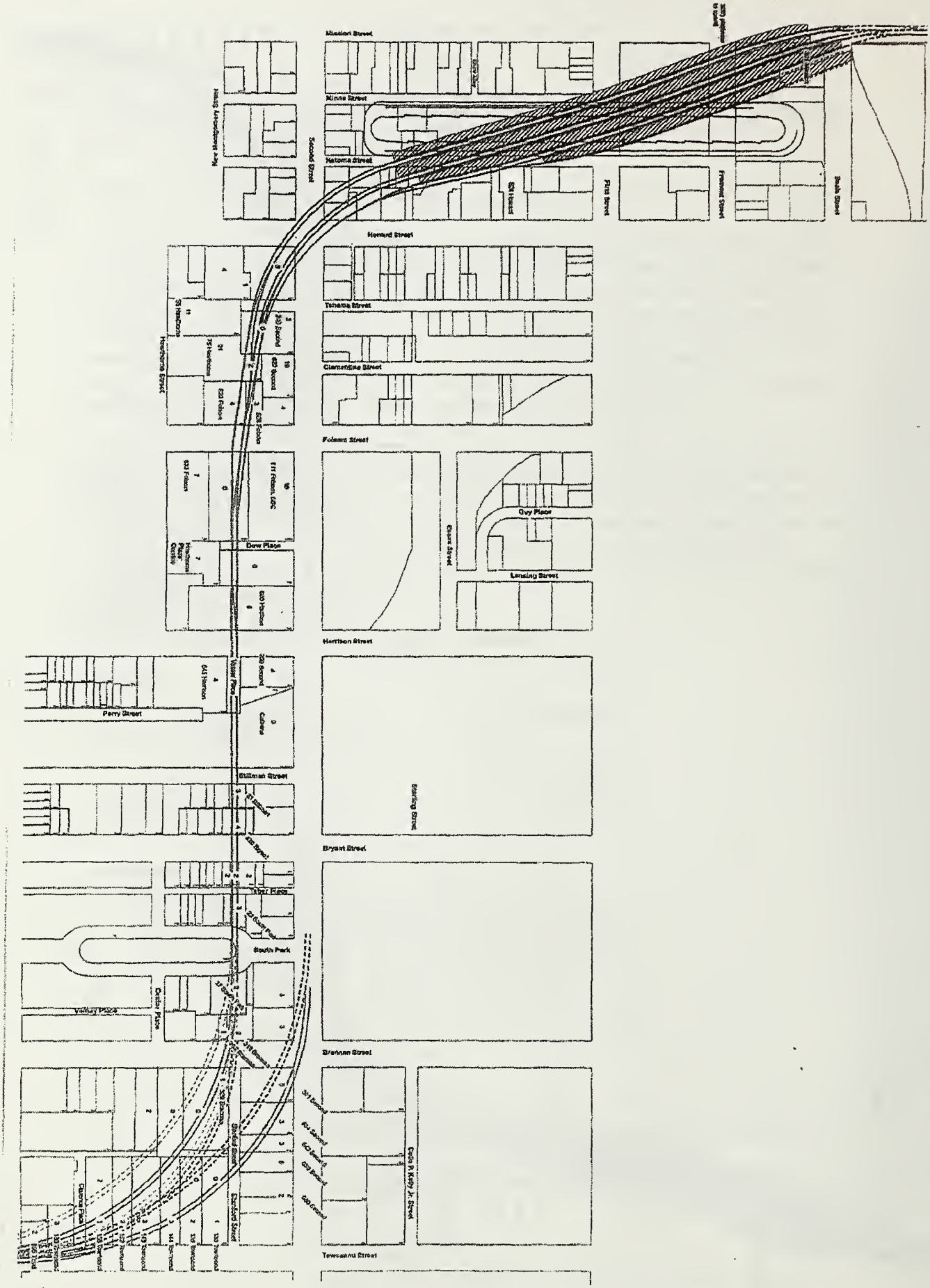

Beale Street
Fremont Street
First Street
Second Street
Mission Street
Minna Street
Natoma Street
Howard Street
Tehama Street
Clementina Street
Folsom Street
Essex Street
Guy Place
Lansing Street
Harrison Street
Sterling Street
Bryant Street
Branman Street
Colin P. Kelly Jr. Street
Townsend Street
Stanford Street
Third Street
Hawthorne Street
Dow Place
Perry Street
Stillman Street
Taber Place
South Park
Center Place
Verney Place
Vassar Place
Clarence Place
New Montgomery Street
Shaw Alley
824 Howard
240 Second
920 Second
606 Folsom
620 Folsom
75 Hawthorne
65 Hawthorne
611 Folsom, 600
633 Folsom
Hawthorne Plaza Condos
600 Harrison
200 Second
Caltrans
643 Harrison
329 Brannan
136 Townsend
144 Townsend
148 Townsend
152 Townsend
166 Townsend
180 Townsend
895 Third

Figure 1


Mission Street
Minna Street
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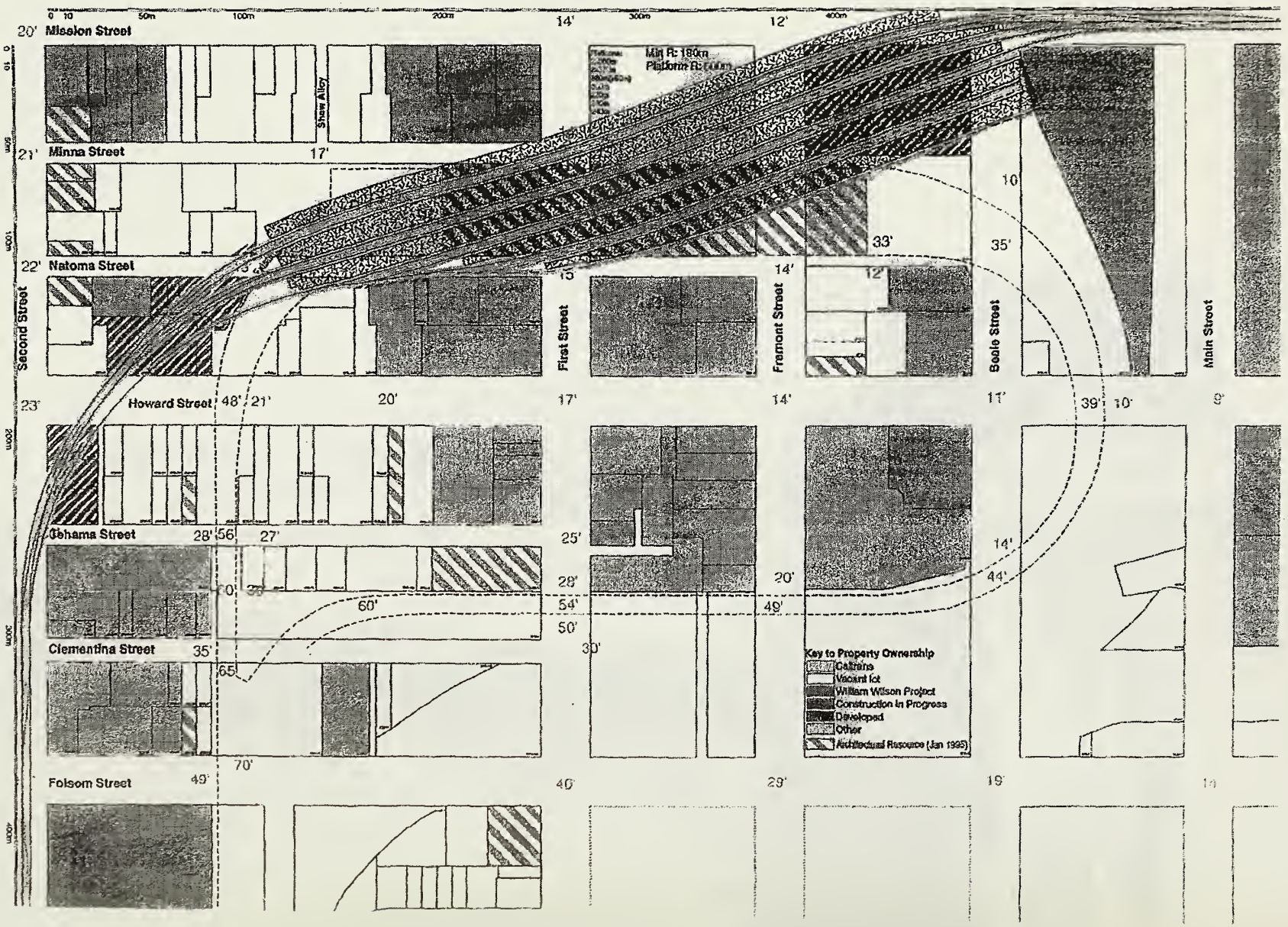
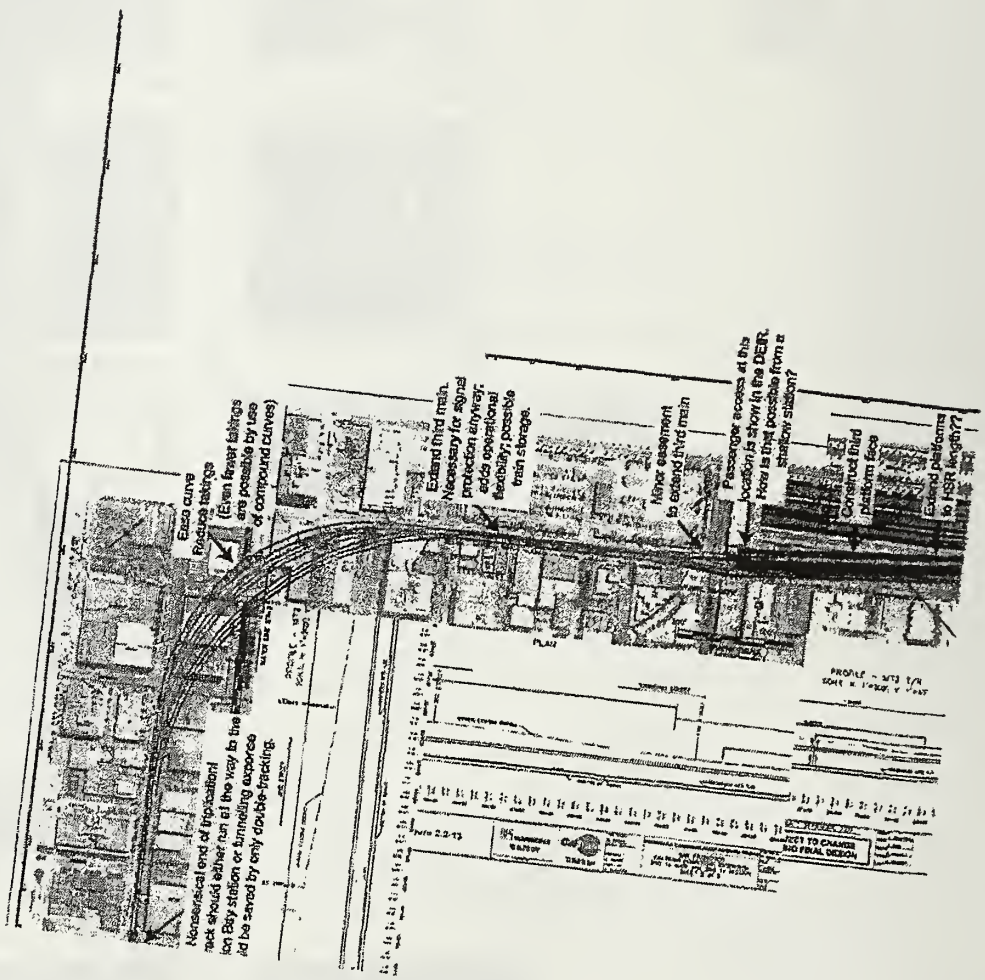
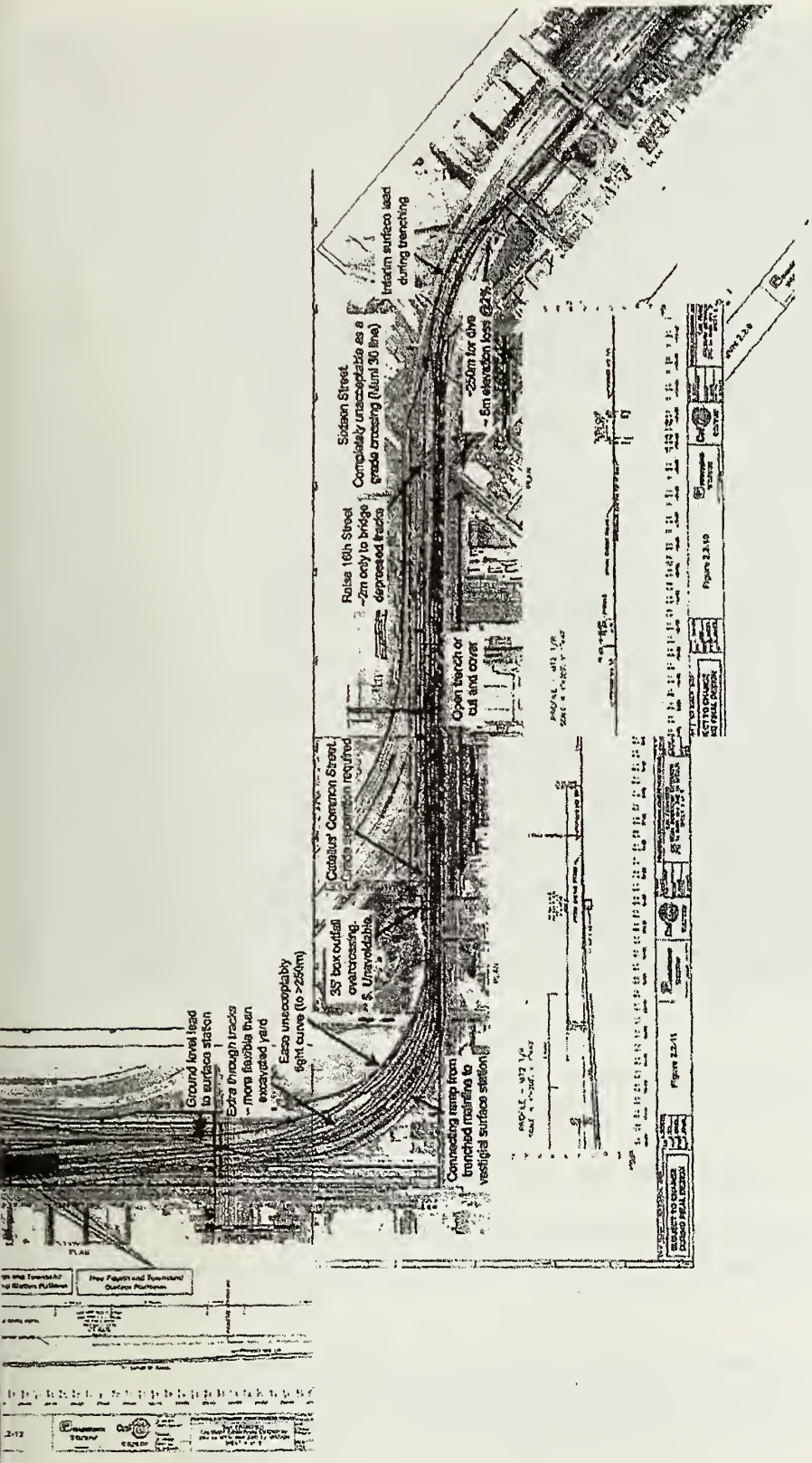
Bryant Street
Brannan Street
Townsend Street
Guy Place
Lansing Street
Essex Street
Dow Place
Taber Place
South Park
Cedar Place
Valley Place
Starling Street
Stanford Street
Clara Place
Colin P. Kelly Jr. Street
First Street
Fremont Street
Beale Street


Mission Street
Shaw Alley
Minna Street
Natoma Street
Second Street
First Street
Fremont Street
Beale Street
Main Street
Howard Street
Clementina Street
Folsom Street
Key to Property Ownership
Caltrans
Vacant lot
William Wilson Project
Construction in Progress
Developed
Other
Architectural Resource (Jan 1995)


Ease curve
Reduce takings
(Even fewer takings are possible by use of compound curves)
Nonsensical end of triplication!
rack should either run at the way to the
ion Bay station or tunnelling exposure
ld be saved by only double-tracking.
Extend third main.
Necessary for signal protection anyway; adds operational flexibility; possible train storage.
Minor easement to extend third main
Passenger access at this location is show in the DEIR. How is that possible from a shallow station?
Construct third platform face
Extend platforms to HSR length??
PLAN
PROFILE - MT3 T/R
SUBJECT TO CHANGE
BIO FINAL DESIGN


Ground level lead to surface station
Extra through tracks – more flexible than excavated yard
Ease unacceptably tight curve (to >250m)
35' box outfall overcrossing. Unavoidable
Catellus' Common Street
Connecting ramp from trenched mainline to vestigial surface station
Open trench or cut and cover
Raise 16th Street ~2m only to bridge depressed tracks
Sixteen Street Completely unacceptable as a grade crossing (Mini 30 line)
Interim surface lead during trenching
~250m for dive
~5m elevation loss @2%
Figure 2.3.10
Figure 2.3.11

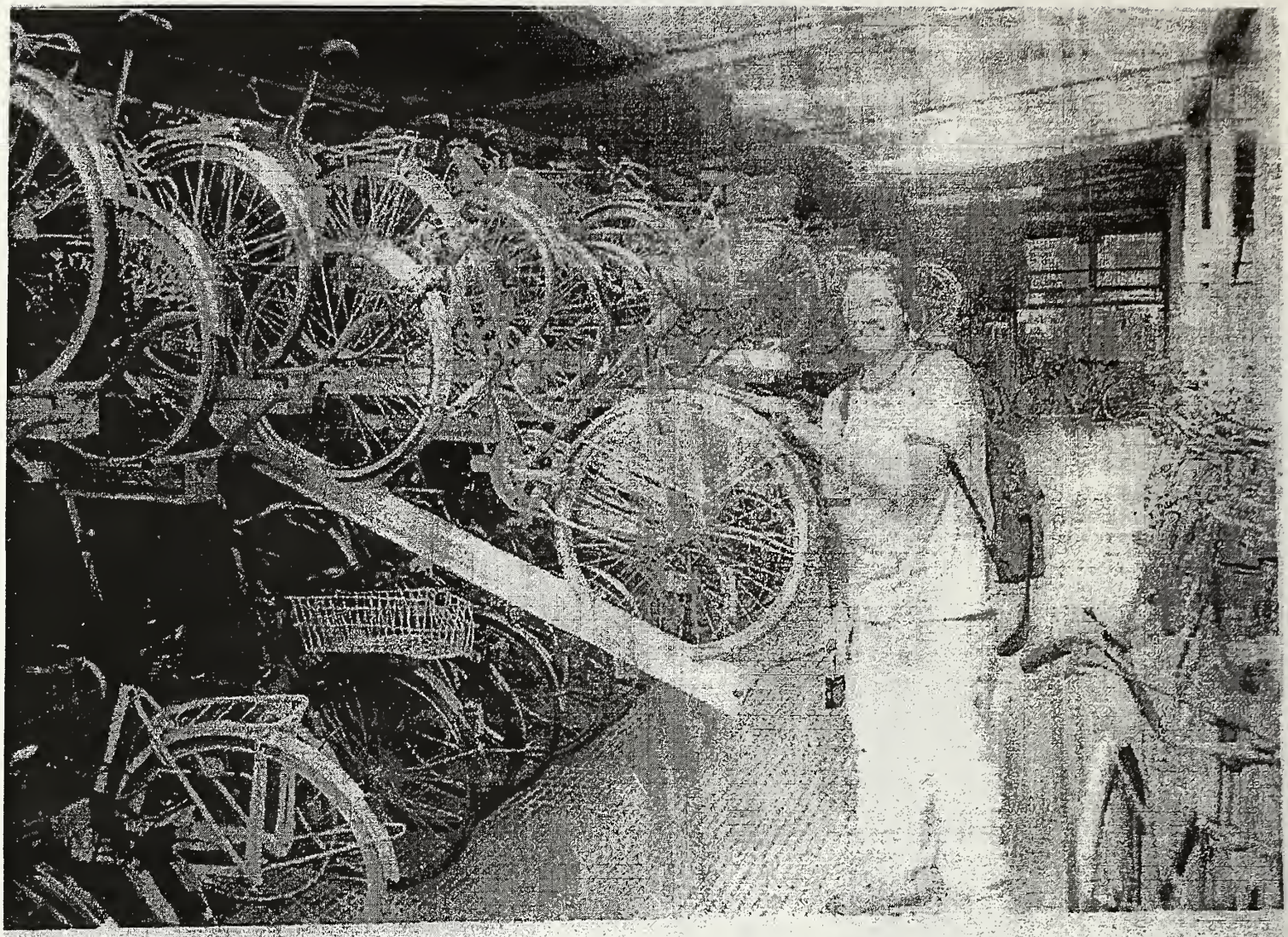


Figure 4

LEAGUE OF WOMEN VOTERS OF THE BAY AREA
An Inter-League Organization of the San Francisco Bay Area

December 5, 2002

Joan Kugler, AICP,
EIR Project Manager
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Re: Comment on DEIS/EIR for San Francisco Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project (City Project No. 2000.048E)

Dear Ms. Kugler;

The League of Women Voters of the Bay Area, an inter-League organization of twenty-one local Leagues in the nine Bay Area counties has long advocated for this project because of its importance for regional transit connectivity.

Several LWVBA goals are in alignment with the opening Statement of Purpose and Need (S-1), notably:

- Improve public access to bus and rail services
- Enhance connectivity between Caltrain and other major transit systems
- Reduce non-transit vehicle usage
- Improve regional air quality by reducing auto emissions
- Facilitate transit use by developing both market-rate and affordable housing next to a major transit hub
- Provide a multi-modal transit facility that meets future transit needs

We are in favor of the West Loop Alternative. In addition to increased land available for development, its configuration provides better access for bus riders because the buses encircle a single platform.

A pedestrian tunnel or other seamless enclosed pedestrian connection between the Transbay Terminal and BART is absolutely essential to make this a regional multi-modal transit facility. It is a necessary link in the regional transit network, and is critically important for physically challenged persons. It is not just a rainy day convenience.

We are pleased that the three projects are considered as a whole and not separately evaluated for environmental impacts. However, we would like some key assumptions in the October 2002 DEIS/DEIR for the Transbay Terminal/ Caltrain Downtown Extension/Redevelopment Project clarified:

1611 Telegraph Avenue, Suite 300, Oakland, CA 94612

Ridership: On pages 1-17, 1-19 ridership from a boom period and mode split from 1990 and 1995 are used. In Chapter 3, Caltrain level of service and fare structure does not reflect recent changes.

- How does the recent drop in ridership with economic decline affect projections?
- Will ridership shifts shown on Page 3-29, Table 3.1-14 and on page 5-119 (decreased Millbrae boardings) fiscally impact Samtrans?
- Do projections take into account BART to San Jose service?
- Are Baby Bullet travel times included in Page 3-30, Table 3.1-15/could they be? Include note that East Bay travel times include other transit providers.

Reduction of auto trips: (Page 1-24-25) It appears from the chart that the primary cause of projected Caltrans ridership increases is the improvement in travel time due to Caltrain improvements, with additional substantial travel time savings after the Extension.

- Does the estimate should take into account an operating BART extension to the San Francisco International Airport?
- What if Caltrain is not electrified by 2006?

Air Quality: (Page 5-50, Table 5.7-1). Protection of air quality is a very important benefit of transit oriented development. Bad math discredits findings.

Land Use: (Page 2-44). The land use mix assumed is dominantly residential which would provide a desirable balance for the intense job center of San Francisco. The Full Build alternative also includes 1,184,590 square feet of office space.

- If the Reduced Scope without office is built, are tax revenues to pay for additional services affected?
- If more office space than "Full Build" is built, consistent with current zoning, how would that affect traffic projections and air quality?
- The open space and community services assumed to suffice should be related to the amount of housing to be built. Does San Francisco have relevant standards or precedents?.

Emergency Services: (Page 4-21). Response times for Fire Department are lacking.

- Will response times be affected?
- What is potential for loss of communications as in BART to airport project?

Business Disruption: (Pages 5-41). "The cost estimate does not include payments associated with business interruption, loss of goodwill, and "nuisance" costs associated with the construction of the extension, including loss of property access."

- Why?

Bus Service Suspension: (Page 5-107). Elimination of SamTrans routes to downtown is of concern to coastside commuters.

- Would suspension of service lengthen commutes from locations such as Pacifica?

Historic Context: The consideration that the existing terminal cannot perform its original function safely is persuasive but the mitigation for loss of historic structures is too vague. "Dynamic continuity" is a creative concept that needs more contextual specificity to be a mitigation.

- What mitigations are likely to be included "Memorandum of Agreement"? (What is previous Redevelopment Agency practice in comparable cases?)
- Are any of the other historic buildings to be removed also seismically unsafe?

Power: (Page 5-106). The implication that reliance on city or PG&E electricity is a problem to be alleviated by deregulation needs some explanation.

Pedestrian Access (construction): (Page 5-175). "70 percent of pedestrians going to and from the terminal would have up to a four block longer walk than under the existing situation" during construction.

- What effect is this expected to have on ridership during and after the construction period?
- Are special mitigations for physically challenged riders needed (shuttle? attention to maintenance of curb cuts during construction?)

Pedestrian Access (post construction) (Page 5-135). The underground connection from the terminal to BART seems important to provide transit linkage, to serve physically challenged riders, to relieve sidewalk congestion and exposure to wind, rain, and traffic mishaps. While restricted vehicle access is a corollary of intense transit-oriented development, poor Pedestrian Levels of Service would seem to suggest more specific mitigations.

- Is connection to buildings with commercial offerings either below grade or from bus level skyway possible?
- Would the linkage save on total trip times, attracting more transit ridership?
- Could a table be provided summing potential users (bus, Caltrain, high speed rail passengers...)

Operating Costs: (Page 5-115). As operating costs are often the hardest to raise, the cost increases for AC for the West Ramp option seem large.

- Can the sources of additional cost be clarified?
- (Page 6-4, Table 6.3-1). A net surplus from additional fares of $2.76 per passenger is outlined to cover the cost of operating the Caltrain extension.
- Is this realistic in the light of the current state of the economy?

Costs relative to benefits More information in Chapter 6 seems necessary to support new regional revenue sources such as bridge toll money or a possible gas tax. The Caltrain extension and Transbay Terminal was included in MTC Track 1 plans with costs per new rider that were lower than most project proposals.

- How does the Great Expectations plan in the DEIR/EIS compare with that MTC analyzed?
- Which terminal and tail configuration is the most amenable to grade separated pedestrian linkage and rail service expansion ?

We greatly appreciate the opportunity to comment on this project and hope to be involved in its fruition.

Sincerely,

Doris Maez

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Onnolee Trapp

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LEAGUE OF WOMEN VOTERS OF SAN FRANCISCO

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November 22, 2002

Paul Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Re: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project DEIS/DEIR dated October 2002

Dear Mr. Maltzer:

The League of Women Voters of San Francisco concur with the analysis of the League of Women Voters of North and South San Mateo County in regards to this report. A copy of this analysis is provided as an appendix to this letter.

Our hope is that this analysis provided by these Leagues will be taken into consideration when the final environmental report is completed.

Sincerely,

Sarah Diefendorf,
Co-President, League of Women Voters of San Francisco

Tuesday Ray,
Co-President, League of Women Voters of San Francisco

cc: Doris Maez, League of Women Voters of North San Mateo County
Onnolee Trapp, League of Women Voters of South San Mateo County

Appendix

APPENDIX

Analysis of Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project DEIS/DEIR dated October 2002

Introductory remarks:

We are pleased that the three projects are considered as a whole, and not separately evaluated for environmental impacts. However, there are still significant details lacking in specifics. Parts of the document are dated and need to be made current. A significant error in air pollution reductions must be corrected. There are numerous syntax and spelling errors in the text. Financial impacts to businesses during the construction period are not considered sufficiently. The financial chapter lacks a cost/-benefit analysis. There is very little discussion of the impacts of the construction and use of the temporary bus terminal and the ramps to it. There is also no discussion of impacts of off-site bus storage. Impacts on historic structures may be the biggest negative impact. Does the willingness/necessity to take down the existing Transbay Terminal compensate for the other losses?

Page 1-17. Caltrain ridership data is already nearly 2 years old and reflect a period of peak ridership during a boom economy. There has been a 17% decline in weekday riders since October 2001. (Source: JPB agenda packet for 10/31/02 meeting) The mix of northbound and southbound riders has most likely changed as well.

Page 1-19. Similarly, cited data for San Francisco employee residency and mode of work trips is quite dated, citing data from 1990 and 1995, respectively. Given the decline in Caltrain ridership since February 2001, Caltrain projections may be inaccurate.

Page 1-24-25. Is the reduction of auto trips estimate based on the number of daily autó trips that take place before or after the Caltrain/BART connection in Millbrae is implemented? Since the base case (no project alternative) includes the BART extension to the San Francisco International Airport, the reduction should be based on the number of auto trips after the BART extension is in service, but that is not clear in the discussion.
Please clarify.
The estimated reduction in auto trips may be affected by the opening of BART service to Millbrae and the resulting connection with Caltrain, will give where northbound commuters will have the option of getting to downtown locations on BART.

Page 2-3. Electrification of Caltrain by 2006 is highly unlikely. Revenue reductions and budget shortfalls caused Santa Clara Valley

Transportation Authority (VTA) to decline to fund its $2.3M share of funding the DEIR for the electrification project in FY 2002-2003. Sources of federal funding were identified, but those are frozen until a lawsuit against EPA's approval of the 2001 Regional Transportation Plan is resolved. It is very unlikely therefore that the environmental review process will be completed in 2003.

Figures 2.2-9 to 2.2-21. The varying orientation (with respect to the north) of the reproduced maps from map to map is extremely difficult to follow. A large map that connected all the components would be very helpful.

Page 2-44, Table 2.2-7. There is a huge amount of office space (1,184,590 sq ft) being added to a part of the city in the Full Build alternative that already is mostly office, and the surrounding areas are expected to be developed mostly as offices. There is no discussion of the financial impact of NOT building the office space. Although proposed office space is considerably less than residential space, office space will bring many more people into the area, mostly by transit. Tax revenues for office space will be different than for residential space, so there will be multiple impact differences between the Full Build and Reduced Scope. If I were a San Francisco resident, I would want more discussion of this aspect.

Page 2-45, Figure 2.2-22. This Figure and Table 4.1-1 on page 4-10 are helpful in conceptualizing the project.

Pages 3-1 to 3-5. The discussion relating to Caltrain level of service and fare structure is dated. Current service is 76 trains on weekdays, with no service on weekends until March 2004 for construction of passing tracks and other upgrades of the signaling system, trackwork, and other improvements to allow for "Baby Bullet" express service. An average 10% fare increase took effect in July 2002. One-way fares now range from $1.50 to $7.25, and discounted midday "offpeak" fares no longer apply. Caltrain ridership is currently well under 35,000 weekday trips.

Page 3-28. Caltrain ridership projections with 170 trains/day sound almost too optimistic. An increase to 50,000 riders/day from the current ridership figures of around 30,000 riders is even more optimistic than the stated 35,600 daily trips in February 2001.

Page 3-29, Table 3.1-14. Why do daily Caltrain boardings at Millbrae decrease in 2020 with the downtown extension (5,948) compared to No Project (8,370)? There is no discussion of possible impact on Caltrain ridership of a BART extension to San Jose. It was noted on page 1-19 that drive-alone rate is highest

(44%) from South Bay to SF, with lowest transit mode (37%) while East Bay to SF is 55% transit.

Page 3-30, Table 3.1-15. The title of this table is misleading, since it includes trips from Redwood City to Concord and from Oakland to San Carlos, which clearly must include BART and MUNI segments. It does not appear to include the addition of the Baby Bullet service.

Pages 4-14 and 4-17, Tables 4.2-1 and 4.2-4. The total number of households in Census Tract 176.02 is listed as 257 in Table 4.2-1 and as 1952 in Table 4.2-4. Which is correct?

Page 4-21. Response times for Fire Department are not given. This important statistic is kept by all fire departments, and should be readily available.

Figures 5.2-1 to 5.2-6. The varying orientation of these maps with respect to north is difficult to follow.

Pages 5-36 and 5-37. It is highly interesting that the increased demands for fire and police services could be met by "reorganizing existing staff". Does it follow that either these services are currently overstaffed or that service will be understaffed when the proposed development takes place?

Page 5-41. "The cost estimate does not include payments associated with business interruption, loss of goodwill, and "nuisance" costs associated with the construction of the extension, including loss of property access."
Why aren't these costs included, or at least an estimate included? These were significant costs associated with some of the Peninsula grade separation projects.

Page 5-50, Table 5.7-1. This table represents some very sloppy work. It is bogus math, and seriously misrepresents the air pollution reductions. For example, 329 pounds/day of ROG equals approximately a ton a week for a 7-day week (59 tons per year), or 1650 pounds per week for a 5-day workweek (43 tons per year), NOT 51,702 tons per year. Data should be verified before inclusion.

Pages 5-54. The discussion about the Regional Transportation Plan applies to the situation before the lawsuit mentioned under comment about page 2-3 was upheld. At the current time, the outcome is uncertain, and federal funding for all projects not already underway is frozen.

Page 5-62. Storage yard noise will not be limited to engine noise, as this discussion seems to imply. Simply moving large pieces of equipment generates noise, as well as associated

activities. To state that no mitigation will be necessary seems far-fetched. Additionally, light sources from this site may be intrusive to surrounding uses.

Page 5-64, Table 5.8-6. Vibration impacts are worse than noise impacts, with little reduction from mitigation using resilient track system.

Page 5-67. Bay mud goes down 100 feet and is the worst seismic hazard for amplified ground motion.

Page 5-68. "Rapid rail repair" is the recommended mitigation for seismic impacts to surface tracks, but there is no mention of mitigation for tunnel collapse at the portals, where the subway depth is in Bay mud, or prevention of damage. What would happen to a train traveling exiting from the subway at the time of seismic motion?

Page 5-70. The paragraph about communications is very inconclusive. Viability of redevelopment for both offices and residences depends greatly on the availability of telephone utilities, and the statement by Pacific Bell that it would take many years to complete relocation is very unsettling.

Page 5-75. How will impacts on the Bay Bridge structure be mitigated, also with respect to NRHP?

Page 5-91. Regarding mitigation of loss of historic structures: The first option of listed Relocation is extremely unlikely. Recordation, Interpretive Display, and Salvage seem practical, but how much do these options really compensate for the loss, and how is such loss calculated?

Page 5-106. There are concerns that dependence on only PG&E or Hetch Hetchy source of electricity seems risky both in terms of supply and cost, unless SF is willing to make a deal regarding its Hetch Hetchy power. The report vaguely hopes that deregulation will alleviate these problems.

Page 5-107. Elimination of SamTrans routes to downtown is of concern to coastside commuters. Coastside locations, such as coast towns Daly City, Pacifica, would be better served (they say) by continuation of bus service to downtown San Francisco, not by feeder to BART or Caltrain.

Page 5-112. The sentence "The West Ramp Alternative would increase the number of bus bays from 32 to 30 bays along and provide..." does not make sense.

Page 5-115. This looks like a huge cost increase for AC Transit for the West Ramp option, which is the lowest overall cost option in all other respects. Is this increase based on the increased mileage required for offsite storage?

Page 5-118. Linked transit trips for the region increase by 10,000/day. This is good, but is really only a little over 1% of the total. The discussion on increase in Caltrain ridership is vague, and contains no discussion of cost/rider.

Page 5-119. The predicted 9% decline in BART ridership in San Mateo County is cause for concern for county taxpayers who will be responsible for BART losses in that corridor. (See comment about page 3-29.) This sounds like it will be difficult to get beyond an operating deficit in the BART/SamTrans agreement. What is the financial equivalent? Will the expected decline in SamTrans expenses offset the BART losses?

Page 5-126-136. Cumulative impacts at seven intersections would be considered adverse and unmitigable. Pedestrian congestion also results in LOS F for eleven corners and two crosswalks. These are serious impacts, and consideration should be given to how streets are used by private cars, commercial vehicles, etc. and to alternatives that limit commercial traffic to nonpeak times.

Page 5-135. Estimates of Caltrain and AC Transit transfers to BART and MUNI based on a 2001 survey found 5% of riders would make such a transfer. However, only half of the AC riders are assumed to use the underground tunnel, which translates to 2.5% of AC Transit riders because the AC Transit loading area is aboveground. All Caltrain riders making the transfer are assumed to use the underground tunnel because the Caltrain platform is underground. Therefore, based on 10% of 50,000 daily Caltrain riders disembarking at the downtown terminal, (see page 3-6) there would be 5% of 5,000, or 250 potential roundtrip users of an underground tunnel from Caltrain to BART or MUNI. Based on 15,205 daily AC Transit riders, (see page 3-15) 2.5% or 380 AC Transit riders would use the underground tunnel. In addition, 108 pedestrian trips are expected to be diverted from the Fremont and Mission Streets intersection. This appears to add up to 738 daily users of an underground tunnel. Is this correct? It would have been helpful if a table were included that adds up these estimates.

We are concerned about transit connectivity after construction is completed. The document states that construction of a pedestrian tunnel connecting the TBT to BART is more likely in one configuration than the other. The (perhaps unintended) message seems to be that this connection might easily be dispensed with, especially if financing is short. This is a <u>necessary link</u> in the regional transit network, and is critically important for

physically challenged persons. It is not just a rainy day convenience.

Page 5-161, Figure 5.20-8. Construction period appears to be a little over four years. The longest activity is the construction of a cut and cover Subway Structure along Track Corridor or tunneling, which lasts 36 months. This is a long time for surrounding businesses and traffic disruption. The area will feel like a war zone.

Page 5-167. The construction period is assumed to be two years for the Second-to-Main Cut-and-Cover Option. Is this for excavation only? (See Figure 5.20-8, which shows a 36-month period of construction.)

Page 5-173-174. This section describes possible mitigation measures to offset the disruption to businesses and community during the construction period. These include onsite and field offices, an information line, signage, traffic management plans, street and sidewalk level decking, sidewalk design and maintenance, and construction site fencing. There is no discussion, however, of the financial impact to businesses during the construction period, and if compensation would be required for loss of business. See also 5-41.

Page 5-175. "70 percent of pedestrians going to and from the terminal would have up to a four block longer walk than under the existing situation." This is a severe impact, and may affect transit ridership during the construction period. Some form of mitigation for physically challenged persons is in order. It is important that curb cuts and other features designed to accommodate persons with limited mobility be retained during the construction period. Perhaps some form of shuttle similar to that used in airport terminals would be helpful in mitigating the impacts on less mobile transit users.

Page 5-182. "It is anticipated that subway construction would last for a total period of approximately three and a half to four years". This appears to conflict with the two-year period mentioned on page 5-166.

Page 6-1 to 6-8. Capital costs are estimated to range from $1.864-$2.095B for the rebuilt Transbay Terminal and Caltrain extension. Federal funding for the project (page 6-8, Table 6,6-1) is estimated at about $600-$700M. However, as discussed before, an approved Regional Transportation Plan and Transportation Improvement Program are required for federal funding, and at the current time, a lawsuit has delayed such approval for an indefinite period of time.

Page 6-4, Table 6.3-1. A net surplus from additional fares of $2.76 per passenger is outlined to cover the cost of operating the Caltrain extension.

These estimates are based on estimated ridership of 50,000 daily weekday riders, which may be overly optimistic. Current operations costs are exceeding revenue sources because of the steep decline in sales tax revenues and drop in ridership in 2002. Sales tax revenues from San Mateo County (per MTC's RTP, page 6-8, Table 6.6-1) are expected to provide $27M of capital costs as well. Are these figures realistic in the light of the current state of the economy?

Chapter 6, general. The chapter lacks a cost/benefit analysis. The financial plan depends on several presently non-existing revenue sources (bridge tolls, gas tax, etc.), uncertain sales taxes, and revenues derived from the Redevelopment Project and Scope (not building proposed office space) and Full Build. There is no discussion of the financial impacts of NOT doing Full Build. This should be a major concern for San Francisco residents, city government, and all the transportation agencies involved.

We endorse the inclusion of considerable residential space in the Redevelopment project surrounding the TBT, and the commitment to the affordable housing component.

Doris Maez, North San Mateo County League of Women Voters
Tel: 650-588-2793; Email: travlnut@hotmail.com

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OAKLAND HERITAGE ALLIANCE

December 5, 2002

Joan Kugler, AICP,
EIR Project Manager
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Re: Comments on EIS/EIR for San Francisco Transbay Terminal/Caltrain Downtown Extension Project (City Project No. 2000.048E)

Dear Ms. Kugler;

The Oakland Heritage Alliance is particularly concerned about the loss of the Transbay Terminal because this National Register eligible property is a regional resource as part of the San Francisco / Oakland Bay Bridge.

However, Oakland Heritage Alliance recognizes that although the Transbay Terminal has served its purpose well in the past, it cannot accommodate an intermodal station which would include a below grade train station and so needs to be replaced by a new structure at the present site that would a landmark of the future. This is the ideal location for a regional transportation hub that will afford efficient transit connectivity.

However the mitigations for the loss of this historic resource are inadequate. We urge a thorough documentation of the building itself and its role as part of transportation history. The information should be available to the public in a usable, interesting form. A prominent space should be allocated in the new building for a permanent exhibition. In fact, a Bay Area Transportation Mini-Museum could be accommodated in the terminal with this as a permanent exhibit. And the very solid comfortable oak benches, which are beloved by bus riders, should be reused in the new facility.

Sincerely,

Mary MacDonald
9.12.

Mary MacDonald
President

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Mail: P.O. Box 12425, Oakland, California 94604

Partnership Transit Coordinating Council

AC Transit • BART • Benicia • CCCTA • Fairfield/Suisun City • GGBHTD • LAVTA • MCTD • MTC • Petaluma • SamTrans • Santa Rosa
SF Muni • Solano TA • Sonoma County • Tri Delta • Union City • Vacaville • Vallejo • The V.I.N.E./Napa Valley • VTA • WestCAT

October 24, 2000

Lawrence Dahms
Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, CA 94607-4700

Re: Partnership Transit Coordination Committee (PTCC) Accessibility Committee - Comments on Paratransit and Access Provisions of Transbay Terminal Improvement Plan

At the September 11, 2000 meeting of the PTCC Accessibility Committee, Rod McMillan, MTC staff, gave an informative presentation on the status of the Transbay Terminal (TBT) Improvement Plan, the regional effort to replace the existing San Francisco Transbay Transit terminal with a new, state-of-the-art building and multi-modal center. On October 10, 2000, a subcommittee of the Accessibility Committee met with Mr. McMillan to further review the conceptual plan and report back to the full Committee. As a result of this review, can advise MTC that it supports the plan and would like to compliment the design that was ultimately developed as well as the consultants' obvious hard work. The Accessibility Committee would also like to forward to MTC and the Bay Area Toll Authority (BATA) the following comments and recommendations regarding the plan which were adopted by the Accessibility Committee at its October 23, 2000 meeting:

1. TBT should be designed to provide a street level paratransit transfer location adjoining the primary taxis zone as well as the ground level terminal facilities between Fremont and First Street. The location should enable paratransit vehicles to approach from all directions, facilitate connections between paratransit van and taxi service, and minimize the distance between terminal facilities and transfer location for disabled passengers. Referring to the current concept design, a location on the north side of Natoma Street between First and Fremont St. west of the proposed mid-block cross-walk appears to meet this criteria. Less vehicle traffic on Natoma Street would minimize conflicts with other vehicles and minimize potential hazards to transferring passengers. Because as many as four paratransit providers may use the transfer location, the location should be approximately 100 ft. long, sufficient to accommodate up to three vans or small buses.

2. The facilities adjoining the transfer location should be in keeping with adopted regional criteria for paratransit transfer locations. According to these criteria, the facilities should:
    - be clean, safe, sheltered, well-lit and provide seating; provide accessible telephones and restrooms near the location;
    - be open during comparable hours to the paratransit service, with ample activity and people nearby.
    - be clearly marked with the adopted regional transfer location sign.

    In accordance with these criteria, the terminal building should be designed so that restroom, escalator, elevator, telephone, seating, ticketing, and staffed facilities are located as close as feasible to the paratransit transfer site.

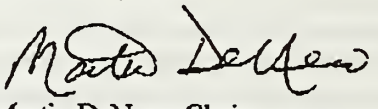
3. As a new state-of-the-art transportation center, TBT presents a unique opportunity to create a state-of-the-art accessible facility. Innovative accessible features and concepts should be incorporation into the design where ever possible. These include:
    - minimizing distance, slope, and travel requirements between accessible features within the facility;
    - providing restrooms and telephones on every floor; providing elevators and escalators between all floors and within each section of the proposed three section TBT building. (Accessibility Committee understands that space is constrained in the portion of TBT containing the ground floor MUNI/Golden Gate Transit bus-bays. However, Accessibility Committee believes an elevator connecting these bays to all other transit levels is a necessity for mobility impaired customers.)
    - orientation surfacing as well as warning tiles (easily recognized by color, contrast, texture and sound) to assist visually impaired passengers with navigation through out the building;
    - crosswalks and paths of travel clearly signed or marked and indicated by a central tactile guideline;
    - providing tactile orientation maps at every building entrance;
    - clear paths of travel, free of street furniture and other architectural obstructions between entrances and boarding areas;
    - providing braille signage and information to indicate bus poles, ticket machines, rest rooms, elevators, and other essential landmarks;
    - using "talking" or auditory signs in addition to visual signs;
    - provide the means to make visual as well as audible public service announcements through-out the station;
    - windscreens where needed;
    - other concepts as needed.

    Accessibility Committee is in the process of preparing a list of accessible design guidelines (to be forwarded to you under separate cover) that will include specific criteria for such components as bus bays, cross walks, pathways, bus pole and sign locations.

4. An accessibility professional who is expert in the ADA Accessibility Guidelines (ADAAG) and California Title 24 requirements must be part of the design team as the project moves forward. This project provides an opportunity to design and build a state of the art accessible transit facility that incorporate the principals of universal design to insure that the terminal is user-friendly and accessible to all transit customers. This opportunity can be realized by:
   - including an accessible transit professional on the design team;
   - including passengers with disabilities in the public review process to obtain feedback on the design of TBT;
   - inviting the PTCC Accessibility Committee to provide input and review and comment on the plan.

Please contact me at (408) 321-704c if you have any questions or require additional information. PTCC Accessibility Committee looks forward to working with MTC staff and representatives of the Bay Area Toll Authority Transbay Panel to help make TBT the best and most usable transportation facility possible for all of its customers.

Very truly yours,



Martin DeNero, Chair
PTCC Accessibility Committee

c: PTCC Accessibility Committee
Bay Area Toll Authority Transbay Panel
Rod McMillan, MTC
Connie Soper, MTC
Jacob Avidon, MTC

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RAFT
Regional Alliance For Transit
Founded 1992

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December 18, 2002

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Re: Transbay Terminal / Caltrain Extension DEIR Comments

RAFT, the Regional Alliance For Transit, was formed over a decade ago to support the enhancement and improvement of the Transbay Transit Terminal (TTT) for AC Transit Transbay service, and to fight various proposals to tear the building down. These comments represent a decade of experience and effort from the members of our group to lead this project to where it is today.

Over the past decade we have witnessed a wide range of official actions on the TTT. Initially, the city wished to completely remove the terminal and ramps, putting hundreds of buses on the congested SOMA streets. As studies began on the Caltrain extension, some quite interesting alternatives were proposed, including running train down the middle of SOMA streets and even on Market Street.

The DEIR that has grown out of the last decade of debate is supported by RAFT. We have concerns with some details of the project, but overall the projects described meet the transportation and planning goals that RAFT has supported and lobbied for over the last decade.

Our specific comments support the detailed comments made by others, specifically those of Richard Mlynarik, Michael Kiesling, and Norman Rolfe.

The bus portion of the project is a well-researched design, and is the result of a decade of work. We support the West Ramp Alternative. As part of this we STRONGLY support the dedicated off-site bus storage facility between Perry and Stillman Streets, beneath the Bay Bridge approach structure. An issue of contention with the previous designs for the terminal was the lack of adequate bus storage. RAFT fought long and hard to ensure that any new terminal would be operationally equal-to or better than the existing terminal. The proposed location, under the freeway, is close to the terminal

and maximizes the use of this already impacted public land. We support designing the bus storage facility to mitigate the concerns of its neighbors, and suggest that with proper landscaping and architectural treatment, the neighbors will find the facility a compliment to their neighborhood, and a great improvement over the existing public parking lot. Additionally, concerns about possible bus diesel exhaust will probably be well-mitigated through the advancement of bus propulsion technology by the time the facility is operational.

The Caltrain extension component is good, but further revision is needed in the trackwork and alignment. We would like to point out the proposed high-speed rail platforms in the Second to Main alternative are completely un-workable, due to the gap between the curved platform and standard high-speed rail cars. Generally, we support the fully tunneled option, leading to a Second to Mission terminal, with no underground connection to BART. We would like to see a modified tunneled alternative studied, involving an alignment approximately 150' west of Second Street. This alignment will further minimize impacts on historic structures, minimize the distance of mined tunneling by passing under many empty properties, and maximize the potential platform length at the Transbay Terminal.

Specific revisions to these basic alternatives include:

- grade separations at both 16th and Common Streets
- easing of the 7th Street curve for higher-speed operation
- consideration of a long-term storage facility south of the project area
- elimination of a storage yard in the Mission Bay area
- addition of a third and fourth track in the Mission Bay area (which can be used for temporary storage)
- altering the tunneled alignment to further reduce the impact on buildings along the alignment
- studying a tunneled alignment approximately 150' west of Second Street
- easing the Townsend-Second Street curve for higher-speed operation
- altering the throat of the terminal tracks for better operation
- altering the rigid design of the terminal trackwork and platforms to maximize the number and length of platforms
- consideration of phasing the construction of the tailtracks until the facility is operational and producing a pfc revenue stream, in order to reduce the proposed debt service
- a good pedestrian connection to a Market Street subway (MUNI/BART) is important, but recommend that other options besides a costly and sterile underground corridor be considered

- consideration of improvements to Ecker Alley, including a new, accessible entrance to the Montgomery subway station, to provide a high-quality, off-street pedestrian connection to Market Street

- continued coordination with the operating plans of the proposed statewide high-speed rail project is necessary to avoid costly design errors and enhance possible shared-use of facilities, especially in the area of maintenance and storage

The redevelopment portion of the project is an excellent example the synergy of land use and transportation. We fully support the Full Build redevelopment alternative. There is no more appropriate place in California, and very few in the country, for this intensity of development. It has been the policy of the City of San Francisco since the 1980's to encourage this type of development between Mission Street and the Bay Bridge. The emphasis on housing only enhances the benefit of the proposed redevelopment. Furthermore, we strongly urge the redevelopment area be expanded to include undeveloped parcels in the center of the proposed redevelopment area, and undeveloped parcels adjacent to the terminal on the south side of Mission Street, east of Second Street. Any new development on these parcels will be greatly enhanced by the TTT project, and it seems fitting that a portion of that benefit be captured to aid the project.

RAFT urges this project to move forward, with further refinement and revision to the items we've mentioned above.

Sincerely

M. Kiesling
for RAFT

RESCUE MUNI

A Transit Riders' Association for San Francisco • Box 190966, SF, CA 94119 • 415/273-1558 • www.rescuemuni.org

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Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

via fax: 415-558-6409

December 20, 2002

Re: **Comments on Transbay Terminal / Caltrain Downtown Extension EIR**

Dear Mr. Malter:

Rescue Muni, a transit riders group in San Francisco, respectfully submits the comments below on the DRAFT EIS/EIR for the Transbay Terminal/Caltrain Downtown Extension project. As strong supporters of this project, we are very excited that this project is finally moving forward after years of delay.

Rescue Muni supports the following Alternatives to the project:

1) Caltrain Extension Alignment – 2nd to Mission.
2) Ramp Configuration – West Ramp Only.
3) Land Use – Full Build Out
4) Subway Construction Method – Tunneling (as oppose to cut-and-cover).

Caltrain Extension Alignment – 2nd to Mission.
We feel this alignment is superior for the following reasons:

- Will allow for platforms with less sharp turning radii than the 2nd & Main alignment. **We believe the 2nd and Main alignment will not accommodate CA High Speed Rail because the platform radii are too sharp, creating large gaps between the train cars and the platform. We believe this is unacceptable.**
- Will be a shorter distance to the Bay for a future extension of conventional rail to East Bay.

Ramp Configuration – West Ramp Only

- We support the West Ramp option versus a full loop ramp because it will free up much more space for Transit-Oriented Development around the site.

Land Use – Full Build Out

- We generally support as much Transit-Oriented Development around the site as possible to help increase ridership at the transit facility, and also to improve the project's ability to pay for itself.

Subway Construction Method – Tunneling

- We support the tunneling method of excavation versus cut-and-cover. According to the DEIR/DEIS this will be less disruptive and less expensive.

Additional Rescue Muni Comments:

Grade Separate 16th Street and Common St.

- With a significant increase in rail service in the near future, especially with the commencement of the Baby Bullet service, we believe that the crossings at 16th Street and Common Street must be grade separated now, rather than later. Muni is planning to re-route bus service all the way down 16th Street with frequent headways. We feel it would be very difficult operationally to have to electric systems intersecting one another at this grade crossing as well as potentially dangerous. We also feel Common Street should be grade separated as it is in the Mission Bay Area, which will soon have high levels of automobile traffic.

Bike Storage

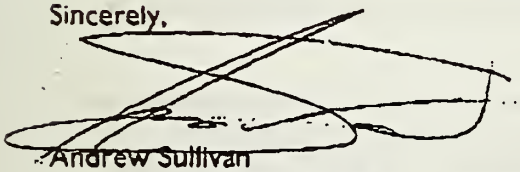
- Significantly increase bike storage at the new terminal over the 105 spaces planned. We suggest 1000 spaces.

Reduce Costs to the Project

- Consider building the tail tracks in conjunction with the California High Speed Rail project. We feel a stub-end terminal will suffice until traffic increases with the commencement of High Speed Rail service.
- Consider postponing the construction of the underground pedestrian path to the Embarcadero BART station. Though we strongly support this project, we feel it can be delayed until there is more traffic at the Terminal and new funding sources can be found.
- Consider postponing the below-ground train yard at Seventh and Townsend.

Thank you for the opportunity to make comments on this crucial transportation project.

Sincerely,



Andrew Sullivan
Chair, Steering Committee
Rescue Muni

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December 4, 2002

Mr. Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Re: Transbay Terminal / Caltrain Downtown Extension / Redevelopment Project DEIS/DEIR

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Charles Edwin Chase, AIA
Executive Director

Dear Mr. Maltzer:

San Francisco Architectural Heritage submits the following comments on the above referenced DEIS/DEIR:

New Transbay Terminal

The DEIS/DEIR does not provide for a preservation alternative for the removal of the existing Transbay Terminal Building, a contributing resources to a National Register eligible property. The two alternatives represent a total replacement of the building and ramp system, which are listed as contributing elements to National Register eligibility.

We believe this is inconsistent with federal requirements, which stipulates special efforts be made to protect historic sites. We disagree that a prudent and feasible alternative cannot be designed that would minimize harm to the known historic resources.

Caltrain Extension from Fourth & Townsend Streets to a New Terminus below the proposed New Transbay Terminal

The two extension alternatives indicate the preferred 'cut and cover' construction method and alternatively, 'tunneling' south of Folsom Street. Tunneling would reduce the adverse effect of loss of contributing resources to the San Francisco South End Historic District and Rincon Point/South Beach Historic District, and minimize the project's impact on known contributing historic resources.

In all cases, retention of the three structures at Howard and Second Street were determined infeasible. Significant subway construction in other major metropolitan cities including New York and Washington DC was accomplished without removal of existing buildings of greater magnitude than those within the proposed tunnel alignment.

In addition there are several technical issues contained within the DEIS/DEIR which require we would like to call to your attention.

Section 4.16.6
This section references the classification of historic resources identified in Article 11 of the San Francisco Planning Code. The DEIS/DEIR lists Category II rated buildings as both significant and contributory and does not reference Category III buildings. This is inconsistent with Article 11 of the code.

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SAN FRANCISCO
CALIFORNIA 94109
TEL 415-441-3000
FAX 415-441-3015
www.sfheritage.org

Section 5.14.3.4

1. Mitigation measures are identified which include recordation. The DEIS/DEIR states: "The mitigation measures identified above are suggested measures; actual measures will be set for thin the MOA. Although recordation eliminates one adverse effect of demolition, the loss of historical information, it does not present the tangible loss of historically significant properties." We believe this to be an inaccurate statement. Previous court decisions have stated that recordation is not a sufficient mitigation to reduce the level of effect below adverse.

2. Page 5-91 references The Foundation for San Francisco's Architectural Heritage. The legal name of the referenced organization is San Francisco Architectural Heritage.

Sincerely,

Charles Edwin Chase, AIA
Executive Director

CEC/s

SAN FRANCISCO BICYCLE COALITION

1095 Market Street #215
San Francisco CA 94103
415.431.BIKE
415.431.2468 fax
www.sfbike.org

PROMOTING THE BICYCLE FOR EVERYDAY TRANSPORTATION

December 5, 2002

Paul Maltzer
Environmental Review Officer
SF Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Dear Mr. Maltzer,

I am writing on behalf of the San Francisco Bicycle Coalition (SFBC) in response to the Draft EIS/EIR for evaluation of the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project.

The SFBC is a nonprofit advocacy group promoting bicycling for everyday transportation. In addition to our 4,000 members, we also work on behalf of the estimated 30,000 regular bike commuters in San Francisco. The SFBC has been a supporter of this project, in general.

The SFBC has serious concerns about the severe underestimation of bicycle parking spaces recommended in the proposed project. The proposed 105 bike parking spaces in the new Transbay Terminal is inadequate. The project should provide at least 300 indoor bike parking spaces, which meet the city's legal requirements for new commercial buildings (Section 155.4 of the S.F. Planning Code).

Bicycle parking at transit centers in the Bay Area have proved immensely successful and popular in the past few years. The Berkeley BART bicycle station regularly reaches capacity at its 75-space bike parking station. The Palo Alto Caltrain bike station regularly parks 60 bikes per day.

The S.F. Embarcadero BART bike station, planned to open in early 2003, is expected to hold 150 bicycles. And Caltrain's planned bike station at the S.F. Fourth & King site, projected to start operation in Fall 2003, will hold at least 100 bikes. Given the central location and high regional transit ridership expectancy for the new Transbay Terminal, it will clearly call for significantly more bike parking spaces than the more constrained transit stations listed prior.

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Simply considering the bicycle ridership levels in San Francisco and, specifically, on Caltrain proves the wisdom of increasing the number of Transbay Terminal bike spots. In San Francisco, an estimated 30,000 residents bike regularly for transportation, according to a 1998 David Binder Research Poll. This number is expected to have risen in the past four years, and does not even include non-SF residents traveling to the city via combined means of transit and bikes.

That multi-modal commute choice of bikes and transit is increasingly popular in the Bay Area, as evidenced by the fact that 6% of Caltrain's riders bring their bikes on the trains, a figure that is actually over capacity.

While most transit systems in the Bay Area accommodate bicycles at some level— including AC Transit, SamTrans, Golden Gate Transit, BART, and Caltrain — there is clearly a capacity problem, as evidenced by the regular overflow of bikes on Caltrain. In addition, the buses hold only up to two bicycles each. As space on transit is limited, indoor, secure bicycle parking must be provided at as many transit stations — particularly regional ones — as possible.

We formally request that the Transbay Terminal project increase its bike parking units to 300 to be located indoors in a secure, visible, easily reached location.

In addition, a change should be made in the EIR to reflect that a stretch of Howard St. does now have bike lanes between 5th and 11th Streets. The SF Department of Parking and Traffic is currently considering a proposal to extend those bike lanes eastward to Fremont Street. Bike lanes on Howard Street will only increase the ease and frequency of bike trips to and from the Transbay Terminal.

Thank you for your consideration of this request.

Sincerely,

Leah Shahum
Executive Director

cc: Peter Tannen, Bicycle Program Manager, SF Department of Parking and Traffic
Honorable Chris Daly, San Francisco Supervisor
Maria Ayerdi, San Francisco Mayor's Office; Peninsula Corridor Joint Powers Board

San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

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December 20, 2002

Paul Maltzer
Office of Major Environmental Analysis
1660 Mission St., Ste. 500
San Francisco, CA 94103

re: Draft EIS/EIR, Transbay Terminal/Caltrain Downtown Extension/Redevelopment project

Dear Mr. Maltzer:

San Francisco Tomorrow would like to express its appreciation to the Planning Commission and to Director Gerald Green for granting an additional two weeks to prepare comments on this important and complex project. We understand that the preparing agencies are working under considerable constraints in preparation of this document, and hope that our comments will make the document more complete and easier to understand.

General

The numerous studies that have been done in this area have produced an intimidating amount of information. Many reports are cited and summarized in this document. Many more reports which were key to the development of these proposals have been left out. The limitations on the size of this document may make this necessary, but the result is that more information is left out than included.. We recommend therefore that the FEIR/FEIS include as an appendix a bibliography of all of the source material for these projects.

The maps in this document are difficult to read and would benefit from the addition of directional arrows. Also, relevant street names are often omitted, again making it difficult to pinpoint locations. Please consider remarking these maps to make them clearer to the reader.

We understand that the funding stream for this project is extremely complex. It would seem prudent to design the project so that, if funding falls short, some aspects could be postponed without compromising the ability to build them later, once new funding sources are found. For instance, components that will be necessary primarily for high speed trains should be planned as part of this process, even though construction may not occur until new funding for that project has been allocated.

Financial Analysis

Project Estimated Capital Costs and Funding Sources. Table S-5 appears to have an inaccurate entry (repeated on Table 6.6-1). The revenue generated by land sales and tax increment is the same for both the West Ramp and Loop Ramp alternative. But these two alternatives do not place the same amount of land into the Redevelopment Area - so these figures should be different for each alternative.

This table (S-5, 6.6-1) also assumes a revenue stream from leverage lease transactions, with the footnote that "Leveraged lease transactions are encouraged by the FTA as innovative financing mechanism." Have the project sponsors considered as another "innovative financing mechanism" the use of ground rents combined with sale of development rights, rather than land sales, to provide an inflation-proof revenue stream for the project?

Environmentally Superior Alternatives

We question the combination of alternatives that on page S-27 are identified as the "environmentally superior alternative". We suggest that this document recommend and justify the environmentally superior alternative for each component separately.. For example, the 2nd-to-Main platform alternative does not qualify as an environmentally superior alternative because it does not fully meet the purpose and need for the project. The platforms in this alternative are not long enough to accommodate high-speed trains As the accommodation of high-speed trains is a specific goal of the project as approved by the voters (see Purpose and Need), the 2nd-to-Main alternative cannot be considered environmentally superior to the 2nd-to-Mission alternative. For the record, here are San Francisco Tomorrow's preferred alternatives:

1. West Ramp Transbay Terminal. This reduces the amount of land required for the ramps, allowing more opportunities for residential development.
2. Second-to-Mission, modified (see Figure 1, Note 6). In addition to its superiority for the accommodation of high speed rail, this alternative would appear to be cost-effective than the Second-to-Main alternative.
3. Tunneling Option. The tunneling option will result in less taking of property and less construction impacts on surface traffic and commerce. Proposition H recommends tunneling wherever feasible to minimize disruptions and relocations in the neighborhood. .

4. Full Build Out. With careful planning and urban design and by minimizing the parking requirements, this area can be a model for building a dense but livable urban environment.

Purpose and Need

In recounting the history of recent planning efforts in and around the Transbay Terminal, it is important that this document cite the voter initiative of November 1999 that instituted the current process. Two sections are particularly relevant to this document;

> Section 2. "As part of the extension of Caltrain downtown, a new or rebuilt terminal shall be constructed on the present site of the Transbay Transit Terminal serving Caltrain, regional and intercity bus lines, MUNI, and high speed rail, and having a convenient connection to BART and MUNI Metro..."
>
> Section 9. "The mayor, the Board of Supervisors, and all relevant city officers and agencies are hereby forbidden from taking any actions that would conflict with the extension of Caltrain to downtown San Francisco, including, but not limited to, pursuing any uses that conflict with Section 2; or undertaking any other land use or development efforts that would conflict with the intent of this legislation."

This mandate must be followed in implementing this project. In the case of this document, it should be the guide for determining the environmentally superior project.

Project Description

It would be extremely helpful if this section would include a map or maps of the entire project area with the three projects delineated on those maps. The current document has no overview of the combined projects.

The Redevelopment Area shows zero space allocated to parking. This doesn't seem realistic, so it must be an oversight. Please include this information in the project description. We trust that any parking provided will be minimal, and unbundled from the residential component. After all, one result of these projects will be the creation of perhaps the most transit-friendly neighborhood in the country. Including parking, especially at anything approaching a 1:1 ratio, would make a mockery of the project and make the creation of a desirable dense urban environment next to impossible.

Modification of Alternatives

It is critical to grade separate Sixteenth Street and Common Street as part of the Downtown Extension rail construction. The Caltrain line must be completely grade separated eventually in order to accommodate greatly increased levels of service and high speed trains. If it is not done as an integral part of Downtown Extension construction, it could be difficult if not impossible to do so in the future, given the existence and design of the ramps leading underground on Townsend Street. It should be noted that because Caltrain traffic levels are now at the lowest levels they'll ever be, single-tracking and line closures necessary to undertake this will be least disruptive if done now. It should be possible to accomplish this without closing the line altogether.

Therefore, an alternative that would place the Caltrain tracks underground from just north of the north portal of Tunnel Number One must be studied. This would eliminate grade crossings at Sixteenth Street and Common Street and make the right of way better suited for future high speed trains. It will also avoid the crossing of Cal-Train's 25,000 volt catenary wires and Muni's 600 volt trolley wires on 16th Street. Although this problem has been solved many times and in many places, it would be best to avoid it.

An alternative in which the proposed underground storage tracks would not be built, but instead be replaced by surface storage tracks in the same location should be studied. Having these tracks on the surface would improve working conditions for cleaning and light maintenance of the rolling stock. They would be accessed via a ramp from the underground line as shown in Figure 1. Development of air rights over the surface tracks could be considered as another revenue source for the project.

Please see the attached Figure 1 for an illustration of the recommended additional undergrounding of the Caltrain Downtown Extension and minor changes in its routing that would result in less taking of property than the alignments shown in the DEIS/DEIR.

San Francisco Tomorrow suggests an alternative platform arrangement that is similar to the 2nd to Mission alternative, but will better accommodate high speed trains (Figure 1). We find the 2nd-to-Main alternative to be seriously flawed, as the straight portion of the platforms will be only 900 feet long, too short for high speed trains. In addition, using the curved platforms in this alternative presents dangerous conditions to passengers (see Figure 2) as the distance between the platform and the train can be significant, ranging up to two feet.

Our modified 2nd-to-Mission alternative has the secondary benefit of reducing the length required for the underground pedestrian connection to Market Street. In addition, this alternative would simplify and improve the circulation patterns for train riders.

Land Use Impacts

It is very difficult to analyze the redevelopment project based upon the data given. We understand that the analysis of Urban Design is not required for this document, but one purpose of this review should be to suggest guidelines and components to be included in the Urban Design Plan for the Redevelopment area. We ask that the following points be included or clarified in that process - and that the Urban Design Plan for the project be completed and widely circulated prior to its adoption concurrent with the redevelopment plan.

1. Pedestrian enhancement should be a key component of the Urban Design Plan. This includes designing those elements that make circulation easier - wide sidewalks, corner bulbs - as well as determining the type of street wall that will be prevalent in the area.
2. Does this plan envision recreating the system of alleys found elsewhere in SOMA, but which were lost when the freeway ramps were built? This document would seem to indicate that this is not the case, but we think it could have many advantages, including breaking up the large blocks, and providing quieter pedestrian thoroughfares.
3. When will the height and bulk changes listed in Table 5.1-1 (page 5-5) be enacted? We suggest that the process await the preparation of the Urban Design Plan, which we understand is being undertaken now. Since several blocks of the Reduced Scope alternative actually feature taller height limits than the Full Build alternative, a plan could feasibly be adopted that uses a combination of height and bulk from the two alternatives to create the final Full Build alternative.
4. The Urban Design Guidelines for this project need to include guidelines for reuse of historic fabric and contextual treatment of new buildings when they are juxtaposed with older buildings. The Redevelopment Plan should incorporate the historic preservation components of the General Plan, including Article 11 of the Planning Code.
5. The new open spaces identified for the redevelopment area must be identified on a map somewhere in this document. Also, assumptions need to be made about the type and intensity of use that would be encouraged or expected at each location, and Design Guidelines developed to suit.
6. If 1:1 parking is provided for the new residences in this new neighborhood, six to eight floors of parking will be needed for each building. This is a problematic design element. To avoid this problem, parking should be retailed separately from the residential units, and any

parking provided must be placed below ground level. Also, as noted above, parking should be provided at a ratio considerably less than 1:1.

Shadows
Can you identify on a map the three new open spaces that will be created in the Redevelopment Area, and list the shadow impacts on these areas?

Wind Impacts
Can you identify on a map the three new open spaces that will be created in the Redevelopment Area, and list the wind impacts on these areas?

Displacements and Relocation
The tunneling method for the Caltrain extension is clearly preferable to the cut-and-cover alternative from the viewpoint of preserving historic structures and minimizing local disruptions. Proposition H also specifies that tunneling be incorporated to the greatest extent possible to minimize relocation of existing homes and businesses

As shown in the attached Figure 1, San Francisco Tomorrow advocates reviewing the track alignment at 2nd and Howard Streets for opportunities to reduce the number of historic buildings that are endangered.

Parklands
Please add a map of the Redevelopment Area that includes the size and location of the open spaces listed on Page 5-39.

Water Resources
Please include information on the increased volume of sewage that would be expected at full build-out, and the corresponding increase in CSOs (combined sewer overflows) into Mission and Islais Creeks.

Historic Resources
The mitigation measures on Page 5-91 should be clarified. How will the feasibility of relocation of historic buildings be determined? The comment about the scarcity of open land in San Francisco is inappropriate; the fate of an historic building should be determined not by its destination, but by the properties of the building itself. This mitigation measure needs to be corrected and clarified.

Why isn't an option included for preserving all or part of the buildings in place? A study should be made of the possibility of saving buildings that might otherwise be demolished during construction of the Caltrain Downtown Extension by means of bracing, underpinning, or other means of support. What is the possibility of preserving at least the facade of one or more of the endangered buildings?

Bus
The bus portions of the Transbay Terminal analysis appear good. The capacity is adequate, but not excessive, and the operating plan is well thought out. However, a signal will probably needed mid-block on Fremont Street between Mission and Howard Streets to expedite Muni and Golden Gate Transit buses exiting the terminal.

Parking
There is no mention of any parking whatsoever for the Redevelopment Area. Figure S-2 and 2.2-22 both give square footages for Hotel, Office, Retail, and Residential uses in this area, but no mention is made of parking. What assumptions were made for the purpose of review in this document? How would a significant reduction in the parking assumptions reduce the adverse traffic impacts determined by this document?

Thank you for your attention to these comments. Please feel free to contact us if you have any questions about our input.

Sincerely,

Jennifer Clary, President
(415) 585-9489

Norman Rolfe, Transportation Chair
(415) 775-9167

attachments:

Figure 1
Notes to Figure 1
Figure 2

Notes to Figure 1

Note 1. Study adding third track in this section of the line. This would be a continuation of the third track proposed each side of this section. This would allow greater operational flexibility , increase the capacity of the line, and reduce the possibility of delays to trains entering or leaving the terminal

Note 2. Study possibility of reducing taking of property by use of different curve radii or compound curve.

Note 3. San Francisco Tomorrow recommends that the feasibility and superiority of grade separation at the 16th Street and Common Street crossings be studied. In this alternative, tracks would pass under 16th and Common Streets (it may be necessary to raise 16th Street to clear underground tracks).

Note 4. Caltrain goes underground from just north of the north portal of Tunnel Number One. Ramp down to underground trackage at 3% grade.

Note 5. This is a refinement of the alternative that should be studied in the final design. We recommend additional studies to determine whether changes can be made in the Second and Howard Street turn that could preserve one or more of the historic buildings in the area that are proposed for demolition in the DEIR/DEIS.

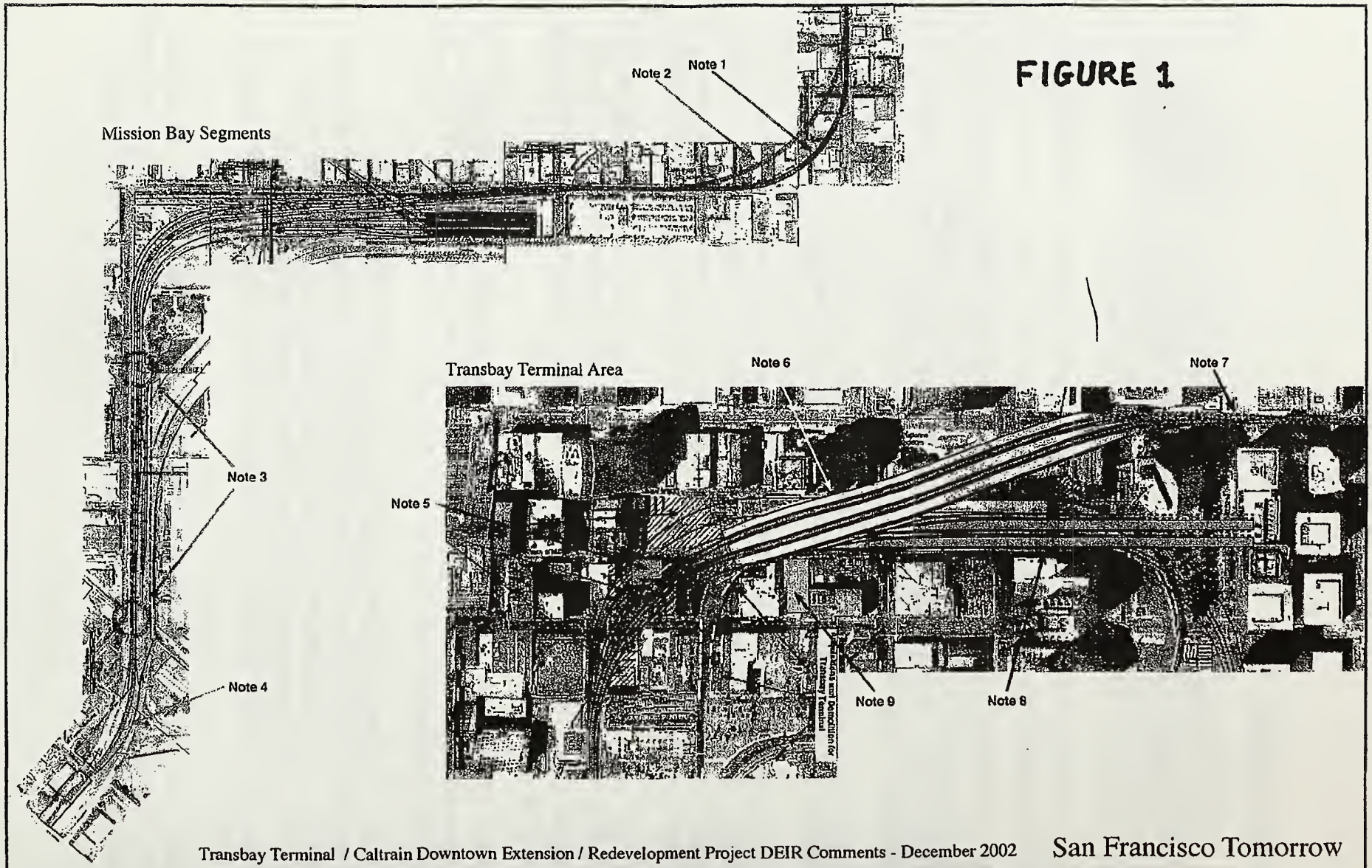
Note 6. Second to Mission Modified Alternative offers the only possibility to construct platforms long enough for high speed rail. This would create platforms that are from 1180 to 1245 feet in length, the longest possible for this project. The European standard is for 1312 foot platforms. .

Note 7. If necessary to conserve capital funds, the tail tracks here could be a separately funded second stage. They will become necessary when service is greatly expanded in the future.

Note 8. Bifurcated platform arrangement of the DEIS/DEIR shown for comparison. The additional diagonal platforms shown here have many footprint and circulation advantages. It is recommended that diagonal platforms only as shown on this drawing be constructed. The Diagonal platforms have the advantage of better circulation - the entrances and exits would be in one general location.

Note 9. We recommend obtaining an easement through the currently vacant lot at 524 Howard Street where a project has been approved, but construction has not yet begun. This would allow a more flexible track design, such as we show in our

FIGURE 1


Mission Bay Segments
Note 1
Note 2
Note 3
Note 4
Transbay Terminal Area
Note 5
Note 6
Note 7
Note 8
Note 9

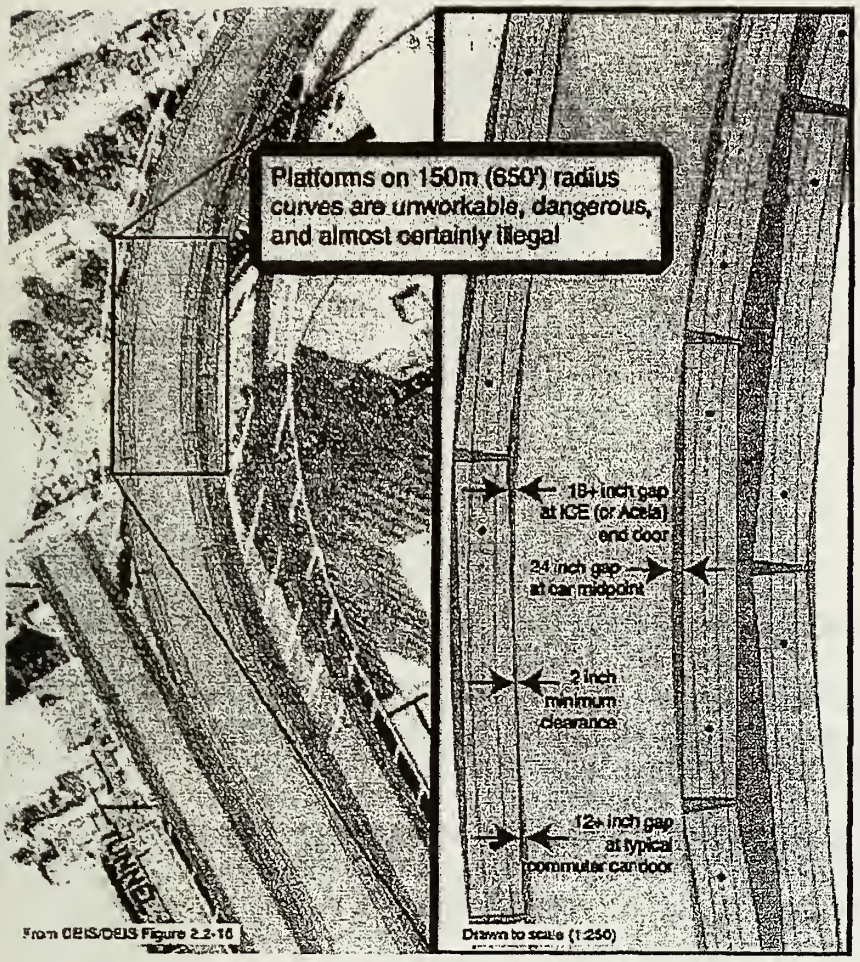

Platforms on 150m (650') radius curves are unworkable, dangerous, and almost certainly illegal
18+ inch gap at ICE (or Acela) end door
24 inch gap at car midpoint
2 inch minimum clearance
12+ inch gap at typical commuter car door
TUNNEL
From DEIS/DEIS Figure 2.2-16
Drawn to scale (1:250)

FIGURE 2

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C. David Robinson
Roderick Roche
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Nicole Sawaya
Paul Sedway
Dave Snyder
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Christine Tejada
Steven Vettel
Wells Whitney
George Williams
J. Peter Winkelstein
Howard Wong
Samson Wong

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November 13, 2002

Ms. Joan A. Kugler
San Francisco Planning Department
1660 Mission Street
San Francisco, CA 94103-2414

Dear Ms. Kugler,

Re: Extension of comment period for Transbay EIR/EIS

SPUR has assembled a working group to comment on the Transbay EIR/EIS and we look forward to sending our written comments to you. We find the document to describe the impacts one of the most complex projects the city has seen. Given that the new Planning Commission has yet to schedule a hearing, SPUR requests that the comment period be extended an additional forty five days (until after the December holiday season) so that we may thoroughly analyze and comment on the document. We believe that this additional time would be valuable for other commenters and is appropriate given the length of gestation time of the project.

Sincerley,

Jim Chappell
President

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Brad Paul
Roslyn Payne
Jeannene Przyblyski
Tom Radulovich
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Roderick Roche
James Russell
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Linton Stables, III
Michael Steinberg
John Stewart
Stephen Taber
Christine Tejada
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Wells Whitney
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Mr. Paul Maltzer
Environmental Review
San Francisco Department of City Planning
1660 Mission St.
San Francisco, CA 94103

Dear Mr. Maltzer:

Enclosed are SPUR's comments on the Transbay Terminal/ Caltrain Downtown Extension/ Redevelopment Project Draft EIS/EIR. Thank you for the opportunity to comment.

Yours sincerely,

Michael Alexander
Chair, SPUR Transbay EIS/EIR Working Group

SPUR Comments

Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

Draft EIS/EIR dated October 2002

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Contributors

Michael Alexander
William Blackwell
Xantha Bruso
Dan Cohen
Paul Jamtgaard
J. Goldberg
Redmond Kernan
Eric Staten
Luba C. Wyznyckyj

Introduction and preferences

SPUR has always advocated for the integration of land use and transportation. SPUR has long supported extension of Caltrain to the Transbay Terminal. As downtown expands to the south, rebuilding an obsolete hub for commuter transit, improving connections to BART, adding High-Speed Rail and surrounding the new terminal with a new mixed-use community that is friendly to pedestrians and non-motorized travel will be essential to the city's continued viability and livability.

Toward these ends, our preferred set of options for this project are:

- West Ramp alternative
- Tunneling option
- Creation of High Speed Rail facilities
- Pedestrian connection to BART
- Selection of a mixed-use development package scaled financially to the cost of the terminal, with proper consideration for urban design issues. This indicates the Full Build option
- We are unable to express a preference on the tail track options, because the information presented is incomplete.

Our internal discussions and analysis of this project have raised a number of questions, reflected in these comments. Financial concerns are more general, while comments on technical issues may be quite specific. Because this is a compilation of individual reviews, please excuse stylistic differences and occasional redundancies.

William Blackwell is a SPUR member and a contributor to SPUR's discussion on the EIR/EIS. He has submitted his own comments. A number of them are consistent with SPUR's preferences, particularly if construction needs to occur in stages. Rather than repeat them, SPUR urges that they be carefully considered and responded to.

Please accept these comments with our support for the project and mutual interest in seeing this great opportunity for San Francisco realized for the broadest benefit for our city and the region.

Thank you for your consideration.

Michael Alexander
Chair, SPUR Transbay Working Group
SPUR representative to Transbay CAC

Transit

Rail

Page S-6 and Sections 2.2.2.1 and 2.2.2.2 Tail Track Options

The Second-to-Main option takes fewer buildings and less land and costs less than Second-to-Mission. But the EIS/EIR does not explain how the tail track options differ in their operational characteristics, so it is not possible to evaluate whether the Second-to-Mission design has overriding advantages. Which is better:

- Three center platforms, or two center platforms and two side platforms?
- Two tracks splitting into six tracks, or one track splitting to four terminal tracks, with two other tracks being extended as tail tracks?

On page 2-35, Section 2.2.2 says that two tracks enter the Transbay Terminal, but Section 2.2.2.2 says that Second-to-Mission's "... southernmost track would branch into four tracks... [and]... The two northernmost tracks would continue on an angle to Mission Boulevard *[sic]*..." Thus, the Second-to-Mission option appears to have three tracks entering the terminal. Please clarify.

Section 2.2.2.4

Both tail track options allow extension of high speed rail to the Eastbay, but such extensions would start from different locations and directions. SPUR believes that the Eastbay extension will eventually happen. Please clarify if one alignment (and if so, which one) offers significant engineering, construction, cost or operational advantages over the other.

Page 3-29

states that Caltrain ridership would increase from about 13,000 to 29,300 daily boardings and alightings at the San Francisco terminal if the terminal station would be moved from Fourth and Townsend to the Transbay Terminal site. Is this significant increase due solely to the extension of Caltrain or also to the development of new office, retail and residential uses in the immediate vicinity of the new terminal that is considered part of the project? Also, page 5-120 states that the Caltrain extension would result in a shift in SamTrans passengers, which seems to account for 2,000 passengers or 4,000 of the daily boardings and alightings. Please clarify.

Page 5-118

identifies a shift in mode share with the Transbay Terminal/Caltrain Downtown Extension Project for work trips between San Mateo and Santa Clara Counties and San Francisco. Is the shift due solely to the extension of Caltrain, or is it also partially due to development in the area associated with the Redevelopment Plan component of the project? Please clarify.

Bus

Page 2-7. Bus Storage: Section 2.2.1.1: West Ramp Alternative

AC Transit Bus Storage is listed as between 42 and 53 buses, plus Golden Gate Transit Storage. No number is given for the Golden Gate Transit Storage portion of the project. In Section 2.2.1.2, Loop Ramp Alternative description, bus storage is identified as being 120 on the ramp and up to 53 in a storage yard. If the entire bus storage need can be accommodated in the storage yard as shown in the West Ramp Alternative, then what is the rationale for choosing the Loop Ramp

Alternative to provide storage? Conversely, in the Loop Ramp Alternative what is the need for a bus storage yard if the ramp will provide over twice the storage of the West Ramp Alternative?

It would be helpful to provide a chart showing the projected storage needs of the various operators.

Page 2-9

The text indicates that Golden Gate Transit *basic service* will be located in the new mid-block terminal, while page 5-114 indicates that Golden Gate Transit *commuter service* would use the new mid-block boarding area. Which one is correct, and how do the services differ?

Please explain why Golden Gate Transit commuter service buses continue to be staged at the curb. Why were they not included in the new Terminal regardless of where the midday layover occurs?

Street improvements included as part of the new Terminal should be described in Chapter 2. There are discussions in Chapter 5 that indicate that street improvements would be made. For example:

- It is unclear if there is a bus lane on Beale Street or on Fremont Street. Discussion of Muni bus travel times (on page 5-113) indicates that "assuming the implementation of a diamond (bus only) lane on Beale Street..." Would there be a bus lane? How would it be configured? What would be the impact on traffic operations?
- Similarly, what would the roadway striping be on Fremont Street? Would the existing bus lane be eliminated? Relocated?
- Page 5-136 indicates that there would be a new mid-block signal on Fremont Street between Mission and Howard Street south of the overpass. What would happen with the existing signal? Has an operations analysis of the buses entering and exiting the terminal been conducted? Why hasn't it been included in Chapter 3 or 5?
- Page 5-136 indicates that a pedestrian mitigation measure should be to ensure that "the Transbay Terminal design increases corner and sidewalk widths at the four intersections immediately surrounding the terminal". Shouldn't this level of terminal design already have been completed? What would happen to the existing travel lanes and curb parking/bus stops? Why haven't these been included as part of the project and their effects analyzed?

Page 2-12

states that with the new terminal that SamTrans would terminate on Mission Street between Fremont and Beale Street, and that SamTrans buses would load on Fremont Street immediately south of the terminal. Would the Mission Street curb between Fremont and Beale Street become the new layover location for SamTrans buses? How much of the curb would be affected? No analysis of the impact of this on parking and traffic operations is presented in Chapter 3.

Page 3-44

identifies current operations of the Golden Gate Transit buses, including the problems with pedestrians queuing for the bus blocking pedestrian flows on Fremont Street. Given the significant increase in street level activity from development in the area, why haven't Golden Gate Transit operations been entirely shifted to the new Transbay Terminal? Why hasn't a plan for street level loading of Muni, SamTrans and Golden Gate Transit buses been developed and illustrated? How much of the street curbs during the AM and PM peak hours be dedicated to idling buses? How and where will future increases in Golden Gate Transit service be accommodated? The impact of operations that remain at street level should be fully discussed.

Page 5-113

states "assuming the implementation of a diamond (bus only) lane on Beale Street between Market Street and through the terminal's designated Muni loading area..." which implies an HOV lane on Beale Street. How would this look? Also, would there be an HOV lane on Fremont Street? Would the existing mid-block signal that facilitates buses exiting from the hump to access traffic flow be removed, or be moved?

Page 5-120.

Please quantify the increase in transfers between Caltrain and AC Transit and Golden Gate Transit, or explain why they aren't quantified.

Section 5.1.1.1 Impacts common to both alternatives

"Additional impacts would occur due to off-site staging and parking requirements for both AC Transit and Golden Gate Transit. Buses would be stored at a lot on Harrison Street." Please clarify how the impacts of the Loop Ramp alternative (Sec. 2.2.1.2), a facility that will hold up to 173 buses, will be the same as for the West Ramp Alternative (Sec.2.2.1.1), a facility that holds only 53. The West Ramp and the Loop Ramp alternatives are quite different, with significantly different impacts on land area where bus storage is concerned.

Table 5.19-1 Operational Differences between Transbay Terminal Alternatives

The numbers in the table don't add up. Some examples:

- Bay Bridge to Terminal: Based on the illustrations in Figure 2.2-1 and 2.2-7, please explain how the West Ramp alternative requires an additional 1,100' of travel distance, the equivalent of 2.5 city blocks, between the Bay Bridge and the Terminal, if the Terminal is in the same location as the existing terminal. The actual travel distance should be less, since the first bus bays are up to 1100' feet *closer* than other alternatives, given the actual travel paths involved. If the number reflects looping within the facility before arrival for the West Ramp, then the distance from the Terminal to the Bay Bridge should be called out separately, since the West Ramp Alternative will have a shorter travel time for this leg.
- Bay Bridge to Terminal to Storage Area: How can this number be the same as for Bay Bridge to Terminal? Since the Loop Ramp and West Ramp alternatives include bus storage in the same yard, as indicated in Section 2.2.1.2, then why aren't the travel distances the same?
- Storage Area to Terminal to Bay Bridge: Same as above.
- Travel Times: the travel times do not match travel distances.
- Travel time from Bay Bridge to Terminal
    - Existing Terminal is 216 seconds for travel distance of 6500'
    - West Ramp is 317 seconds for travel distance of 7600'
    - Loop Ramp is 227 seconds for travel distance of 6500'
    - Why is the travel time greater for the Loop Ramp vs. existing, if the distance is the same?
- Travel Time from Storage Area to Terminal To Bay Bridge
    - Existing Terminal is N/A. Buses are currently stored on the ramp, and not in the facility. (See p. 5-114, Bus Storage Areas) Why is this not reflected in the table?
    - West Ramp is 329 seconds for travel distance of 7600', a difference of + 12 seconds over the same distance listed for Bay Bridge to terminal. Reversed, the same travel time is 334 seconds, a 17 second increase for the same route in reverse.

- Loop Ramp: why is travel time 13 seconds more than the same distance given for Bay Bridge to Terminal? Why does the same trip in reverse take 3 seconds less? why the discrepancy between this and the West Ramp alternative?

- Please review the remaining travel times and distances for similar problems.
- Ramp to Terminal: if the Loop Ramp Alternative replicates the same configuration and function as the existing condition, why is there no travel time listed here?
- Notes: Note 1 of the table says that "no deadheading or off-site staging is currently involved with AC Transit operations". P. 5-114 says that currently AC Transit buses are stored on the access ramps and not in the terminal. If the current facility and the Loop Ramp alternative both use the access ramp for bus storage, how can one not require "deadheading or off-site staging" when the other does?

Table 5.19-2

- AC Transit operating costs. Given the errors listed above, the numbers here don't seem to add up. If the terminals are all in basically the same place, then the numbers should be closer than shown. Given the information presented, we question that operating costs could be so much higher for the West ramp than for the existing situation.
- P. 5-117 says that table 5.19.2 shows that the Loop Ramp Alternative requires a 78% *increase* in operations and maintenance costs, and then characterizes this as "not significantly higher...than under the current situation." Please clarify how such an increase is not significant.

Pedestrians

- The Second-to-Main and Second-to-Mission Caltrain Extension Alternatives both include a design option for a pedestrian connection underneath Fremont Street to the BART Embarcadero Station (S-7, also 5-118). However, only 0.16% of people walked, 4.63% took BART, and 0.23% took Muni rail to get to the Transbay Terminal in the morning (3-46). Also, while 78% of TBT patrons walked from the Terminal to their destinations in SF in the mornings, only 1.7% of them use BART and 2.96% of them use Muni rail. Please explain how the pedestrian tunnel to BART/Muni would significantly promote linked transit ridership and stem pedestrian reductions in the TBT area.
- Special Pedestrian Conditions concerning casual carpool and Golden Gate Transit queues are mentioned (3-43); however, there are no mitigation measures proposed for these conditions.
- The EIS makes no mention of current or future obstacles to pedestrians with disabilities, or how the TBT intends to comply with the Americans with Disabilities Act.

Page 5-136

- The text indicates that there would be a new traffic signal on Fremont Street between Mission and Howard Street. Would the new signal be in addition to the existing mid-block signal? What would a "full stop" phase be? Since the only vehicular movement at the mid-block crosswalk is westbound, and since buses exit the surface terminal downstream of the proposed new mid-block signal, a signal similar to the one that currently exists north of the terminal should be sufficient to accommodate pedestrians and vehicular traffic.

- The EIR/EIS does not include operational analysis of the access and egress from the surface level of the new Terminal.

Page 5-136.
Would it be possible to provide access to the pedestrian tunnel from street level? If so it would serve many more people than the 108 currently identified.

Bicycles

The EIS adequately covers the issues of bike lanes, bike ridership, and bike storage. However, it also needs to identify short-term bike parking at the TBT or on the sidewalks around it as a way to promote bike ridership and lessen automobile impacts.

Autos and Parking

Page 5-121.
The reduction in person-hours of vehicle travel by seven percent seems high. What is the reduction in travel times based on? Was the significant development in the South of Market area considered?

Page 5-122.
The methodology that the Planning Department used for determining adverse effect at the study area intersections should be up front before Table 5.19-4.

Page 5-122.
Why does Table 5.19-4 have Existing plus Project conditions, while the text header is Baseline plus Project? This is somewhat confusing. 2020 Baseline plus Project seems understandable and indicates that it is not a true Existing (2002) condition.

Page 5-123.
What does the shading on Table 5.19-5 represent? Some of the "adverse effect" intersections are shaded, but not all. Were some missed?

Page 5-126.
The EIS expects there to be 7 intersections with "adverse and unmitigable" traffic impacts. The only improvement proposed is that the City may request developers to contribute to the new Integrated Transportation Management System program. Since developer participation is not mandatory and this system has not yet been implemented, what evidence is there that it might ameliorate these specific traffic impacts?

Development Strategy

The EIS/EIR should clarify why the project is to be constructed all at once, and what procedures and environmental review will occur if that strategy is found to be infeasible and construction happens in stages.

William Blackwell is a SPUR member and a contributor to SPUR's discussion on the EIR/EIS. He has submitted his own comments. A number of them are consistent with SPUR's preferences,

particularly if construction needs to occur in stages. Rather than repeat them, SPUR urges that they be carefully considered and responded to.

Economics

The key issues of financing and development raised in the EIS/EIR center on some fundamentals of the entire project's stated feasibility. As a redevelopment project, the importance of revenue from land sales gained by the removal of the Eastern ramps segments and the later tax increment streams are clearly seen as essential to the viability of the project. However, no sufficient discussion is given to the pre-development financing of the project. Please explain the sources of project and construction money needed before the availability of revenues from land sales and tax increment.

The analysis of the revenues from mixed-use development appear to be the same in both ramping alternatives. The West Ramp alternative will make available somewhat more land for mixed-use construction. More importantly, it consolidates a city block, making development options much more attractive and valuable. As a result, land sales and subsequent tax increment revenues should be significantly higher. Therefore, we believe the EIS/EIR's assumption that revenues are the same for the alternatives is inaccurate.

Similarly, the West Ramp and Loop Ramp alternatives show the same construction costs. Since the West Ramp is considerably shorter, the cost assumptions appear to be inaccurate.

Construction Issues

SPUR is concerned about the impacts of the Cut-and-Cover Option to historic architectural resources and existing business operations. Dramatic change to SOMA in the last decade has included the loss or alteration of many historic structures that play a significant role in giving our city its unique character. Many of the buildings that would be demolished under Cut-and-Cover are contributors to historic districts, making their value greater than as individual pieces of architecture.

The impacts of cut-and-cover when BART/Muni was built under Market St. raises additional concerns. Existing businesses suffered for years from construction limits on public access, and many businesses failed.

SPUR therefore supports the Tunneling option and strongly encourages efforts to minimize adverse impacts to historic structures and districts, and existing businesses.

Design

Historic/ Cultural Resources (Sections 4.16 5.14 & 7.2)

Section 5.14.2, Archaeological Resources: Mitigation

- By stating that mitigation measures for both archaeological and architectural resources would be set forth in an MOA, the EIS/EIR is deferring the mitigation. Per CEQA Section 15126.4(a)(B): "Formulation of mitigation measures should not be deferred until some future time. However, measures may specify performance standards which would mitigate the significant effect of the project and which may be accomplished in more than one specified way." Deferring mitigation to a future MOA without setting performance standards in the EIS denies the public its opportunity to provide input on the proposed mitigation, and makes the EIS inadequate.

Section 5.14.3.3, Redevelopment Components

- The conclusion that neither of the redevelopment alternatives would have an adverse impact on historic properties does not seem correct. Since the intention of creating a redevelopment area would be to encourage and facilitate new development in the designated area, there could be an increased likelihood that historic resources located within the area would be altered or demolished. The EIS should identify protections against such impacts.

Section 5.14.3.4, Affected Properties

- Please note that the 670-680 Second Street building has been altered in recent years and converted to an office building. As such, the structure no longer appears as depicted in this document. A Negative Declaration was prepared by the City of San Francisco for the alterations to this property.

- Section 5.14.2 refers to mitigation for architectural resources, but its mitigations are about archaeology. There should be a separate section on mitigation of architectural resources. See our comments about adequacy in Section 5.14.2, above. Providing a list of types of measures and stating that these are merely suggestions is not adequate. It should be stated here which, if any, of these mitigation measures would have the potential to reduce impacts to a less than significant level and whether such a conclusion would be different for different buildings.

- Please explain what is meant in the last sentence of Section 5.14: "...recordation eliminates one adverse effect of demolition..." Since demolition means the total loss of a building and results in a significant unavoidable impact for an historic resource under CEQA, how does recordation eliminate one adverse impact?

Section 7.2, Unavoidable Significant Adverse Effects Under CEQA

This section should list which buildings and districts would be significantly impacted under each alternative. The lack of clarity of the Historic and Cultural Resources section makes this doubly important.

Visual & Aesthetic Issues

Summary Project Description, p. s-3: No-project alternative

- There is no discussion of the need to seismically upgrade the existing Transbay Facility. Wasn't the expense of doing this one of the main reasons for rebuilding the facility?

Summary Table, p.s-16, Visual/Aesthetics Impact Category:

- No-Build Alternative:
  - Will this alternative have additional visual impacts due to requirements that existing facilities need to be seismically upgraded?
- Transbay Terminal Components:
  - Because there are no supporting illustrations of the Loop Ramp Alternative, other than a site plan diagram, it is not possible to evaluate the visual/aesthetic impacts of this scheme.
  - Based on the illustrations and text provided, it is clear there are significant differences between the two terminal alternatives. The West Ramp Alternative replaces a single-deck loop ramp with one double-decked ramp; how does this

make the ramps "less visually intrusive"? How does the Loop Ramp Alternative enhance views? Views from where?

- Caltrain Extension:
  - The Tunneling option would have significantly fewer aesthetic impacts on the area than the Cut-and-Cover option. In addition, what is the likelihood that new construction will be of the same scale as that which is demolished?
  - What are the mitigation measures proposed for the Caltrain extension? It seems that the Tunnel option is the way to mitigate the aesthetic impacts of the extension.
- Redevelopment Components:
  - There are two redevelopment alternatives; it seems highly unlikely that the two alternatives will have the same visual impact. Does the text in the table refer to both schemes?

Summary Table, p.s-17, Transit Operations Category:

- No-Build Alternative:
  - What are the impacts on operations if portions of the facility must be closed for seismic upgrading?
- Transbay Terminal Components:
  - How can the Loop Ramp Alternative with almost double the number of bus bays handle only 68% of the passengers of the West Ramp Alternative?
  - What is the mitigation proposed for off-site bus storage?

Chapter 2, Description of Project Alternatives

- In general, the almost complete lack of illustrations of the Loop Ramp Alternative make meaningful analysis of the visual and aesthetic impacts of this scheme impossible.
- Levels of Redevelopment, p. 2.43
  - How does the full build/reduced scope development scenarios relate to the two terminal proposals? The Loop Ramp Alternative has less land available for redevelopment and the land will be under greater constraints than the West Ramp Alternative. Thus the EIS/EIR is inaccurate in not comparing development levels for each ramp alternative.
  - It would be useful to know what the proposed development levels mean in terms of FAR, building height, building separation, and relationship to height and bulk limits of the planning code. Do the development levels spelled out deviate significantly from what is permitted under current zoning?
  - There are significant differences between the development envisioned in Table 2.2-22 and the illustrative model shown in Fig. 5-16.3. Please clarify.
- Levels of Redevelopment, Figure 2.2-22:
  - Some of the development levels seems highly unlikely when compared to parcelization, adjacent land uses, etc. For instance:
  - Block #3718: it is difficult to imagine that the shape of the parcel as drawn will support the level of development illustrated.

Section 5.16. Visual and Aesthetic Environmental Consequences and Mitigation Measures

- The minimal graphic representation of the Loop Ramp Alternative make it difficult to gauge its visual and aesthetic impacts.

- 5.16.1 No-project alternative, p. 5-92, 93
  - The existing terminal would require extensive seismic renovations. There is no discussion of the negative aesthetic impacts this could have.
  - Do continued existence of the bus ramps contribute to declining levels of maintenance and investment in surrounding properties, and therefore constitute a future negative aesthetic impact?

- 5.16.2 Transbay Terminal, p. 5-93
  - Figure 5.16.2 does not clearly show the difference between the west ramp (stacked) and the loop ramp (split) scenarios. It shows existing and stacked ramps only.
  - Model of Potential Redevelopment Sites and Scale, Fig. 5.16.3, p. 5-99: Please provide evidence of the likelihood that developers would propose high-rise projects, especially residential high-rise development, in such close proximity to one another as shown in the illustration.
- 5.16.3 Caltrain Downtown Extension
  - The cut and cover option will have significant visual and aesthetic impacts in both the near and short term. Operations will cause disruptions to the surrounding businesses and store frontages by making access for customers and employees difficult for extended periods of time. When this occurred on Market and Mission Streets during the construction of BART, many businesses failed or moved away, resulting in long-term deterioration to the urban fabric, and therefore producing significant negative visual and aesthetic impacts. Similar impacts could and should be expected in the project area under this option.
- 5.16.5 Changes to Scenic Views and Vistas
  - The loss of views mentioned in the report is not illustrated. Are these lost views from existing buildings, or from public spaces and streets? If the former, then it should be noted that the new development will replace these views with an equal or greater number.
  - On page 5-98, the report states that the spacing between the new towers in the redevelopment area would be greater than is typical North of Market, but the model illustrated in Fig. 5.16-3 sseems to show towers spaced as close or closer than the north of Market St. condition.
- 5.16.6 Change in the Cityscape
  - There is no Illustration 5.16-6 in the draft plan
  - Illustrations 5.16.4 and 5.16.5 do not show the views that are "more differentiated as the stepping up of development heights towards downtown is realized" The views as illustrated are much more monolithic and undifferentiated than described, espceally in Fig. 5.16-5. Better illustrations would be helpful.
- Other:
  - Sound walls: there is a mention somewhere in the report that sound walls are required. Are they required on the ramps? If so, this is a major impact that is not illustrated in the document.

TRAC
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DEC 2 0 2002
PLANNING DEPT

December 19, 2002

San Francisco Planning Dept.
Attn: Paul Maltzer, Environmental Review Officer
1660 Mission St., Suite 500
San Francisco, CA 94103

Subject: Transbay Terminal EIR Comments

Dear Mr. Maltzer:

We are dismayed to learn that the new Transbay Terminal / Caltrain Extension EIR does not include the alternative of rehabilitating the existing Transbay Terminal for use as a joint rail and bus terminal for Peninsula trains, high speed rail, and Transbay buses. We believe that this alternative should be seriously considered for the following reasons:

1. The extraordinarily high cost of removing and then replacing the existing facility. Replacement costs are much higher than re-configuring the existing facility. Property acquisition would be entirely eliminated by re-configuring the existing facility.

2. The estimated cost of rehabilitating the Transbay Terminal in the 2001 MTC Transbay Terminal Improvement Plan Study was only $275 million. Since the existing terminal was built and operated as an interurban railway terminal from 1939 to 1956, the additional cost of rehabilitating the terminal for use by trains of the same weight should be minimal.

3. A rehabilitated and reconfigured transbay terminal will serve future needs for more than a quarter of a century. The capacity of the existing terminal is well in excess of any prospective needs for the next 30 years or more. For example, the capacity of Lane 3 which formerly accommodated Tracks 5 and 6 would be 300 rail commuter cars per hour assuming 2 minutes for loading or unloading and one minute for entrance and one minute for exiting. Since Caltrain operates only about 40 cars per hour maximum at present, even a very conservative capacity estimate of 200 cars per hour with 10 car trains would be more than adequate for any for seeable increase in rail commuting from the Peninsula. Lane 2 has room for 15 bus loading zones. Assuming 1.5 seconds loading time per passenger with fare pre-payment, a loading time of 1.5 minutes for 60 passengers, and a consequent minimum headway per zone of 5 minutes, a capacity of 180 buses per hour from the east bay could be accommodated in Lane 2.

Currently, AC Transit operates only about 80 buses per hour during the peak hour. Similarly, Tracks 1 and 2 in Lane 1 could easily handle all of the high speed trains that one could ever hope to see. Other bus operators, such as Golden Gate Transit, can be easily accommodated in Lane 2 with AC Transit for the foreseeable future. Greyhound which now operates 5 to 10 coaches per hour in Lane 1, could easily be relocated to the ground level such as Natoma Street behind the terminal where Amtrak formerly boarded passengers.

Alan C. Miller
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San Diego County

Ron Kilcoyne
Los Angeles County

Estelle Shiroma
Yolo County

Hal Wanaselja
San Francisco County

TRAC, active since 1984, is a non-profit consumer lobby advocating improved passenger train service in California.

4. We believe that the reasons given in the EIR for not considering the rehabilitation of the existing Transbay Terminal for rail and bus use to be without foundation or justification. Most, if not all, rail passenger cars in the United States can operate around a 250 foot radius curve. The 870 foot long platforms can accommodate 10 car trains which is more than long enough for any foreseeable demands. The design capacity of the terminal and loop is 75 tons per car which is adequate for most commute rail cars, high speed rail cars, and high speed locomotives. Talgo, which now operates trains in the Northwest, has informed us that their new high speed Talgo 350 Km. trains can with minor modifications negotiate curves of less than 250 feet. There cars also weigh less than 37 tons per truck with passengers as do the French TGVs. With reuse of the terminal for trains and buses as described above, there is no need for an additional bus deck, so no major seismic work is required. The claim that obtrusive bracing would be needed for rail was based on the erroneous assumption that an additional deck would be needed for buses above the existing building.

5. Re-use of the existing Transbay Terminal would not require acquisition of additional property. This is a major cost savings and a major environmental advantage.

6. Proposition H of 1999 mandates fiscal prudence. Conserving public resources through reuse is the least-cost alternative. The two alternatives considered in the EIR require the installation of a much more massive 2 or 3 level structure over both 1st Street and Fremont Street than the existing single level structure. This installation presents obvious environmental impacts which have not been adequately addressed by the report.

7. San Francisco Proposition H of 1999 mandates that the City select the most economical alternative for extending Caltrain to the Transbay Terminal that provides rapid and efficient service. Since a loop terminal does not require inbound trains to cross outbound tracks, or outbound trains to cross in front of inbound trains, or require crews to reverse trains, as with a stub end terminal, a loop terminal can be expected to operate with fewer and shorter delays.

We would also like to recommend that a direct tunnel connecting Tunnel #1 on the Caltrain line with the throat to the Transbay Terminal Loop between Harrison and Folsom be considered. A direct routing would be about 1.25 miles long, require no property takings, and allow much higher speeds south of Harrison Street. In the course of the preparation of the report, reuse of existing facilities was ruled out because of the supposedly high cost, but now appears to be the most feasible option as new construction options assumed by the report now have a cost in the billions of dollars. This is as much true on the Bay Bridge as it is with the Transbay Terminal. Adaptive reuse of both facilities for rail should be studied in detail before any final decision is made on the configuration of a new TBT.

Whichever option is chosen, we believe a rail terminal on the second level with access to the Bay Bridge should be studied carefully as part of the project. After completion of the new east span, there is no reason to demolish the old span. The east span could be retrofitted for rail (plus bicycles and pedestrians) and connected to the existing west span. The rails-on-the-bridge study concluded that adding rail to the west span would cost less than $1.5 billion, but this alternative was ruled out because of the supposedly high cost. In light of the tunnel alternatives, which soar to $12 billion as estimated by the MTC, rehabilitation of the Transbay terminal is the most feasible option.

Rail on the Bay Bridge and a second level Transbay Terminal rail facility should be evaluated and compared with the other options in detail before any final decision is made on the configuration of a new TBT.

Sincerely,

Richard F. Tolmach
President, Train Riders Association of California

TRANSPORTATION SOLUTIONS DEFENSE AND EDUCATION FUND

16 Monte Cimas Avenue Mill Valley, CA 94941 415-380-8600

December 20, 2002

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CITY & COUNTY OF S.F.
DEPT. OF CITY PLANNING
ADMINISTRATION

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

Re: Transbay Terminal DEIS/R

Dear Mr. Maltzer:

Transportation Solutions Defense and Education Fund (TRANSDEF) is a non-profit organization dedicated to improving regional planning for transportation, land use and air quality for the Bay Area. The Transbay Terminal / Caltrain Downtown Extension/ Redevelopment Project is the most significant project to come forward during our ten years of advocacy. It embodies all the most positive aspects of Smart Growth and the regional approach we have been advocating. We support the project wholeheartedly. In addition, we are pleased to note that the quality of the DEIS/R is consistent with the quality of the project. The DEIS/R is comprehensive, thoughtful, detailed and well-edited. The preparers are to be congratulated.

TRANSDEF supports the detailed architectural comments of RAFT and Michael Kiesling. Due to the commentors' many years of involvement with the details of a Caltrain rail extension, we are confident that the alignments proposed therein deserve close study as additional alternatives to the two rail alternatives in the DEIS/R.

Recognizing that no document is perfect, TRANSDEF appreciates the opportunity to provide the following comments, which are keyed to page numbers:

S-7 and elsewhere: The reference to Mission Boulevard appears to refer to Mission Street.

S-27: While the Summary contains a description of the Environmentally Superior Alternative, a more extended discussion in the body of the DEIS/R would be useful.

1-28: The Project will also need MTC and federal DOT approvals.

2-11: It appears that the location of the lower bus level exit ramp on the drawing is incorrect, as it conflicts spatially with the entry ramp to the upper bus level.

3-25: The high existing peak period transit capacity utilization indicates a need for mitigation for the increased passenger demand resulting from the Project. Please evaluate the impact of increased use of the Terminal on the need for additional Muni service, to maintain acceptable service standards. Note, for example, on 5-114 how the ground level loading area will operate near capacity for existing levels of transit service. Determine locations for loading for the full complement of transit service needed to adequately serve the new Terminal.

3-26: Verify that the capacity utilization numbers in Table 3.1-13 are comparable. Describe the capacity utilization service standards for the other transit operators.

3-28: The asserted 140% increase in 3.1.6.1 is incorrect.

3-48: The discussion is unnecessarily complicated by the inclusion of BART patrons that did not use the Terminal in the AM. Because they are irrelevant to any useful conclusions, they should be deleted.

4-29: On July 23, 2002, the US Court of Appeals for the 9th Circuit issued a stay of MTC's mobile source emissions budget, pending review of a challenge to its adequacy. This triggered a second conformity lapse, which is still in place as of the date of this letter. In addition, the SIP's Negative Declaration of Environmental Impact is facing challenge in Superior Court. If successful, the SIP approval would be vacated.

5-9: The Land Use analysis of the Redevelopment Project fails to evaluate the Project's regional land use benefits, which include preserving suburban open space (see 5-122).

5-49: An analysis of the tax and other economic implications of a operational Project is glaringly absent. The Project should have strikingly positive net benefits to the San Francisco and regional economies. Increases in retail sales and employment should be estimated, along with increases in the taxes reported in Table 5.6-5.

5-49: The air quality analysis must evaluate the regional emissions reductions that result from the increased use of bus transit and the corresponding decrease in auto travel.

5-49: The air quality benefits of the Redevelopment Project must be identified here. This will occur through correction of the definition of alternatives on 5-122 (see below).

5-95: The Figure legend should be "stacked" not 'staked.'

5-115: Please provide an explanation for why operating costs for AC Transit will increase beyond existing levels.

5-119: Include the Muni and other transit operator cost savings in a comprehensive analysis of Fiscal and Economic Impacts.

5-120: Because the expected most significant benefit of the Project is the synergy of bringing all the region's transit operators together at one location, it is especially important to evaluate the impact of this co-location on the ridership of each of the operators. It is not adequate to say that the Caltrain extension "would likely encourage transfers from Caltrain to AC Transit buses, thereby increasing AC Transit bus ridership." The increase in transit ridership should be evaluated for its impact on mode split, regional VMT and air emissions.

5-121: A 20% decrease in peak hour delay is very significant. Please verify that this is reflected in the air quality analysis. It should also be highlighted as one of the benefits of the Project.

5-122: The land use intensities of the three alternatives listed here are not comparable, making comparisons of impacts invalid. The total development for each of the alternatives be at the ABAG Projections level. Suburban development on the fringes of the Bay Area must be correspondingly decreased. The work done for the Regional Agencies Smart Growth Strategies/Regional Liveability Project Smart Growth Alternative should be very helpful here. We suggest consulting ABAG for guidance as to where to reduce projected suburban development, because they are assembling the Projections for the Smart Growth Alternative. These alternatives then need to be plugged in when re-running the emissions and travel demand models (see 5-49 and 5-120) and looking at open space consumed by suburban development (see 5-9).

5-126: Provide additional mitigations for adverse impacts at seven intersections: (1) reduce maximum parking ratios permissible in the Project area, (2) require provision of City Car Share-type service for new development in the Project area and (3) increase local transit service to the Project Area. The best way to avoid congestion is to discourage driving and provide convenient transit. Without parking, the Project Area will not be a destination for autos.

5-135: Please explain the methodology used in developing the extraordinarily low projected Caltrain rider transfer rates to Muni Metro and BART.

5-138: Please explain the methodology used in developing the surprisingly low projected need for bike storage.

5-174: Because no additional parking or feeder transit service to Caltrain stations is assumed, it is clear that Caltrain patronage could increase significantly beyond projected levels, were these facilities to be added in the future. This is additional justification for the mitigations proposed at 3-25 above.

Several issues arose that we believe should be discussed in the FEIS/R:

- It appears that the upper bus level of the West Ramp Alternative uses only half of the space available. It would be desirable for the building to have the structural capacity to build out the other half, if demand for it should develop in the future.

- If the rail lines are extended to the East Bay in the future, the tail track function would be lost. Should the right-of-way for replacement tail tracks be identified and protected?

TRANSDEF is very pleased with the DEIS/R for this exceptional project. The comments we raise here mostly seek full documentation of the regional benefits of the Project. We believe that the Bay Area needs to understand how beneficial this project will be. In addition, we have identified the need for further mitigation of the Project's impacts. Thank you for this opportunity to comment on the DEIS/R. Should any questions arise as a result of these comments, please contact us at the address on the letterhead.

Sincerely,

David Schonbrunn

David Schonbrunn,
President

VII. Businesses

COBLENTZ, PATCH, DUFFY & BASS LLP

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December 20, 2002

VIA FACSIMILE AND HAND DELIVERY

Mr. Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

RE: Draft Environmental Impact Statement/ Draft Environmental Impact Report/Section 4(F) Evaluation (DEIS/DEIR) For The Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project ("Transbay Project")

Dear Mr. Maltzer:

We represent Mission Street Development Partners, LLC, the 301 Mission Street project sponsor. The project site is on the south side of Mission Street between Fremont and Beale Streets, Assessor's Block 3719, Lots 1 and 17. We write to affirm the DEIS/DEIR's conclusion regarding the Environmentally Superior Alternative (including the Second-to-Main alignment) and to request that this Alternative be selected as the Locally Preferred Alternative.

Both the Second-to-Mission and Second-to-Main alignments can accommodate a potential cross-bay high speed rail connection in the future. However, the Second-to-Mission alignment has numerous adverse impacts in comparison to the Second-to-Main alignment, including substantial and prolonged excavation and closure of Mission Street and unresolvable conflicts with the 301 Mission Street project, a development with substantial public benefits, including generation of tax increment necessary to support the Transbay Project. It is also significantly more costly, due to more extensive excavation, Mission Street disruptions, property acquisitions, and loss of tax increment. None of this is reflected in the document. The DEIS must be revised to include a more thorough analysis of the Second-to-Mission alignment, both to comply with NEPA and CEQA, and to properly identify for decisionmakers and the public its significant impacts.

INTRODUCTION AND SUMMARY OF COMMENTS

By way of background, the 301 Mission Street project is a substantial mixed use development, including 320 dwelling units, commercial spaces, sizable publicly accessible open space and other features designed to activate and enliven Mission Street. It is currently undergoing environmental review, and we anticipate that the Draft Environmental Impact Report ("DEIR") will be published at the beginning of the year. As part of the DEIR process, the City and Caltrain representatives shared conceptual plans for the Transbay Project with the project sponsor and their technical consultants in an effort to evaluate the impact of the Transbay Project on the 301 Mission project. The consultants analyzed the conceptual plans and developed several DEIR project Alternatives. Technical memoranda summarizing the Alternatives are attached as Exhibit A. Those Alternatives consider the feasibility of accommodating both the Transbay Terminal and the Caltrain Extension. Based on this analysis, the project sponsor believes that the 301 Mission Street project could likely be modified in a feasible manner to accommodate the Terminal portion of the Transbay Project and the Second-to-Main alignment. This accommodation would involve a partial acquisition of the 301 Mission Street project site, significant construction coordination and additional construction costs.

The technical analysis for the 301 Mission Street DEIR concludes that the Second-to-Mission alignment cannot feasibly be accommodated. The DEIR analyzes both building above the alignment and on a "remainder" area outside of the alignment. As discussed in Exhibit A, those Alternatives are infeasible for a variety of technical, urban design, cost, timing and other reasons. The DEIS/DEIR fails to identify, yet alone analyze, these impacts of the Second-to-Mission alignment on 301 Mission Street.

The DEIS/DEIR Second-to-Mission financial data is also unsupported. The economic data in the document is based on studies developed for the 1997 Caltrain DEIS/DEIR, which did not include the extension alignments. As a result, there is no evidence — not a single document — in the public record supporting the cost estimates for the Second-to-Mission alignment. Exhibit A establishes some of the 301 Mission Street technical consultants' preliminary cost estimates of the alignment as it relates to 301 Mission Street, but the DEIS/DEIR itself is devoid of any meaningful cost data for 301 Mission Street or any other aspect of the Second-to-Mission alignment.

TRANSBAY DEIS/DEIR COMMENTS

The DEIS/DEIR does not meet its burden as a disclosure document because the Project Description for the Second-to-Mission alignment lacks information required by

law. Impacts from that alignment, including those related to the 301 Mission Street project,[1] are absent from the document or are inadequately analyzed. This is a particularly glaring deficiency given the high burden of Alternatives analysis under NEPA for an EIS. The NEPA Alternatives analysis has been called the "lynchpin" of an EIS, requiring "substantial treatment" in the document. See, e.g., 40 C.F.R. § 1502.14. The analysis also disregards substantial adverse impacts of the Second-to-Mission alignment — information that is critical to the decisionmakers' evaluation of the preferred alternative. Our specific comments on this and other issues are provided below.

1. Page S-27, Environmentally Superior Alternative. We concur with the document's conclusion regarding the Environmentally Superior Alternative, particularly as it relates to the Second-to-Main component. However, the list of benefits is incomplete. The Second-to-Main alignment significantly reduces operating expenditures and costs (including acquisition costs), increases tax revenue (including from tax increment), minimizes disruptions to Mission Street (a major thoroughfare and General Plan Transit Preferential Street), substantially reduces excavation and related construction truck trips (and related traffic and air quality impacts), retains the 301 Mission Street development, is more compatible with surrounding development and generally results in reduced impacts in the areas of land use, displacement and relocation, socioeconomic, fiscal, noise and vibration, utilities, visual/aesthetic and transportation impacts, all as discussed below in comments 6-15 and in Exhibit A. Please revise the list to include these additional benefits of the Second-to-Main alignment.

2. Page 1-1, Purpose and Need for Transportation Improvements. The 301 Mission Street Project is consistent with and assists the Transbay Project in fulfilling several of the "primary purposes" and "associated needs" cited on page 1-1. This must be noted in the text so that the public and decisionmakers are advised that the Second-to-Main alignment accommodates the 301 Mission Street project, preserving its associated benefits, while the Second-to-Mission alignment does not.

The primary benefits of the 301 Mission Street project are as follows. The 301 Mission Street project proposes a substantial mixed-use development of approximately 320 residential units, 120 hotel units, 130,560 gsf of office use, 9,400 gsf of restaurant/retail use, 6,400 gsf of publicly accessible atrium space and 4,340 gsf of ground-floor lobbies. It would make a positive contribution to the Downtown skyline through innovative design and building form, including a graceful, slender tower

[1] The 301 Mission Street project is a reasonably foreseeable project and the DEIS/DEIR must analyze it. See C.C.R. Title 14, Section 15130(b)(1)(B).

articulated through elements such as a podium and central atrium. The project would also provide an active and pedestrian-friendly ground-floor environment, with attractive open spaces and retail uses; contribute significant resources to the City through generation of various fees and taxes (including but not limited to affordable housing, open space, transit, art, schools and child care fees and property, transient occupancy and parking taxes); generate substantial new employment opportunities in a variety of job classifications, including entry-level jobs; and support the City's efforts to redevelop the Transbay Terminal by providing an immediately adjacent, high-quality project generating substantial tax increment. This increment is critical to the Transbay Project, which has a significant funding gap under every development scenario analyzed in the DEIS/DEIR.

3. Pages 2-21 — 2-37, Project Description for Caltrain Extension Alternatives. The Project Description fails to perform its essential function as a disclosure document because it lacks sufficient detail for the Second-to-Mission alignment. For example, the document does not describe the impacts related to Mission Street generally, the loss of the 301 Mission Street project, and the limited reuse opportunities available for that site. The latter two are described in Exhibit A. The Project Description also omits operational considerations, such as the expense resulting from two platforms and separate tracks under the Second-to-Mission alignment. For these reasons, it is impossible to adequately analyze the impacts of the Second-to-Mission alignment. However, based upon the project sponsor's understanding of the alignment, we have provided additional impacts information below. We request that both the Project Description and impacts analyses be substantially revised to incorporate these comments and to provide the full level of analysis mandated by NEPA and CEQA.

4. Pages 2-38 — 2-41, Cost Estimates. These cost estimates are fatally flawed in that they refer only generically to source information (usually simply by consultant and year), rather than citing any memoranda or analyses. This is a problem throughout the DEIS/DEIR. We have requested the underlying background documents supporting the DEIS/DEIR Tables, but are advised that no such information exists and that the numbers have simply been updated from earlier reports prepared in connection with the 1997 DEIS/DEIR. However, because the Second Street alignments were not included in the 1997 document, there is no original data to be "updated." Accordingly, there appears to be no evidence in support of these numbers. If such evidence exists, it must be identified and should be made part of the DEIS/DEIR Appendix. Specifically, the text lacks support regarding the right-of-way acquisition, relocation and resale figures and "mid-point estimate for real estate." It is inconceivable that the Second-to-Mission alignment under the cut-and-cover and tunneling options would result in only a $32.6 and $31.2 million additional net cost, respectively, as compared to the Second-to-Main alignment. As established in Exhibit A, there is no feasible 301 Mission Street

project Alternative based on the Second-to-Mission alignment. The acquisition cost of 301 Mission Street alone would far exceed the additional net cost cited in the DIES/DEIR. Extremely limited reuse opportunities for 301 Mission Street and complexities of construction work in Mission Street under the Second-to-Mission alignment would substantially increase the net cost differential far beyond the DEIS/DEIR estimate.

5. Pages 2-48-2-53, Alignments Considered and Withdrawn. The text describes a number of Caltrain Extension alignments that were considered and withdrawn. Among the reasons for withdrawal are operational issues based on platform location (page 2-50), potentially substantial noise, traffic, air quality and other construction impacts (page 2-51), increased capital operating costs and reduced operating efficiencies (page 2-52) and impacts of a long tunnel on the real estate above (page 2-53). The Second-to-Mission alignment shares each of these impacts, none of which is discussed in the DEIS/DEIR. Each of these impacts must be analyzed, and the Second-to-Mission alignment must be similarly rejected as infeasible.

6. Pages 5-3 — 5-4, Land Use Impacts. The statements regarding land use impacts are conclusory and unsupported by evidence as they relate to the Second-to-Mission Street alignment. This section ignores facts about that project that are a matter of public record — the sole reference to 301 Mission Street is a one paragraph statement on page 5-4. In fact, the Second-to-Mission alignment would pose a substantial land use conflict with the 301 Mission Street development. As discussed in Exhibit A, the Second-to-Mission alignment renders the 301 Mission Street project infeasible, and severely restricts reuse of the site. The consultants have determined from documents not otherwise even described in the DEIS/DEIR that the alignment involves construction of a forty-five foot deep (or possibly deeper) tunnel which would traverse directly through the 301 Mission Street property. It is obvious that the location of the tunnel and its physical configuration would significantly alter both the remaining below grade and above grade buildable area on the property. The train tunnel and the pedestrian mezzanine connecting the bus terminals will take about 2/3 of the entire site.

If the 301 Mission Street project does not move forward, the City would not enjoy the various benefits of the project, discussed above, and most importantly its 320 dwelling units, significantly enhanced street-level experience, and substantial tax increment, which is a critical funding element of the Transbay Project. The DEIS/DEIR contains no discussion of the environment that would remain along this important segment of the Mission Street corridor, nor of how loss of development opportunity at this site impacts the value or reuse potential of surrounding properties. The loss of this project is a foreseeable and significant land use impact of the Second-to-Mission alignment that must be identified and discussed.

Also absent from this discussion is any analysis of relevant Downtown Plan policies related to land use. By way of example, see Objectives 7 (expanding housing supply Downtown) and 13-16 (urban form). The Second-to-Mission alignment is inconsistent with these policies with respect to its 301 Mission Street site impacts.

The Land Use section purports to analyze wind and shadow impacts. Despite the enormous scope of the project, the DEIS/DEIR does not follow the City's standard format and in fact provides far less information than would normally be included in a Downtown project analysis. For example, the shadow discussion makes conclusory impacts statements, without including any quantitative information or graphics to support or explain the conclusions. The 301 Mission Street development is a foreseeable project that must be included in these analyses.

7. Pages 5-19 — 5-32, Displacements and Relocation. What are the funding sources for the property acquisitions listed in the charts, and when do these funds become available? Why doesn't the displacement section mention the loss of approximately 320 housing units under the Second-to-Mission alignment?

8. Pages 5-31 — 5-32, Socioeconomic Impacts. The statements regarding socioeconomic impacts are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. The loss of the 301 Mission Street project and the limited reuse opportunity as a result of the Second-to-Mission alignment is a socioeconomic impact. As discussed above, that project will generate substantial employment opportunities, fees and taxes that would be eliminated under the Second-to-Mission alignment. The analysis must also include the socioeconomic impacts of businesses disruptions along Mission Street during the lengthy Second-to-Mission alignment construction period.

9. Pages 5-44 — 5-49, Fiscal Impacts. The statements regarding fiscal impacts are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. The DEIS/DEIR discusses right-of-way acquisition in Tables 5.6-2 and 5.6-3. The basis for the Fiscal Impacts analysis is indecipherable, as only general reference is made to the Sedway Group, First American Real Estate Solutions, Comps Inc. and Marshall Valuation Service information. Again, how were these numbers generated? How can there be no supporting documents? The DEIS/DEIR must include specific references and background documents that support these numbers and conclusions to provide a road map for decisionmakers as to how these conclusions were reached. Those documents should also be included in the Appendix. The cost of the Second-to-Mission alignment is clearly understated in light of the substantially greater acquisition costs, and the limits to reuse of the property. Specifically, on page 5-45, footnote 7 references a $50 million total valuation for the 301 Mission Street property. How is this reflected in the acquisition estimate tables? What is the basis for

this determination? This is inaccurate in that it represents only a partial value for the 301 Mission Street site. Tables 5.6-1 — 5.6-3 misrepresent the difference in acquisition costs between the two alignments, which is shown as only approximately $10 million.

The estimates for payroll tax and retail sales tax losses are also underestimated. How is the limited reuse of the 301 Mission Street site reflected? There appears to be no analysis of that impact. Presumably Mission Street would be closed in phases over a significant period of time to accommodate the Second-to-Mission alignment. What is the phasing plan? This in turn would have substantial impacts on businesses along Mission Street. These are not even mentioned in the DEIS/DEIR. Also, what is the engineering solution to tunneling beneath the Muni turnaround and the historic Agriculture Building at the terminus of Mission Street — how has that cost been addressed in the Second-to-Mission alignment analysis? What are the timeframes and associated costs for each of these? Is it even feasible? How does grade change of this tunneling impact high speed rail? The DEIS/DEIR fails as a disclosure document without this crucial information that speaks to the fundamental feasibility and impacts of the project. Under both CEQA and NEPA, the perfunctory description of the Second-to-Mission alignment and impacts is a fatal flaw, and the document must be revised to include the requested information.

10. Pages 5-55 — 5-65, Noise and Vibration. The statements regarding noise and vibration impacts are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. The Second-to-Mission alignment involves a long tunnel which impacts the developability of real estate above the alignment, as discussed in Exhibit A. The Noise and Vibration discussion makes no reference to impacts of the Second-to-Mission Street alignment on 301 Mission Street or other properties along Mission Street, nor does it identify measures (and their associated costs and timing of implementation) that might be necessary to reduce vibration to acceptable levels.

11. Pages 5-69 — 5-70, Utilities. The statements regarding utilities impacts are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. With the substantial excavation of Mission Street that would be required, clearly there would be substantial utilities impacts that are not analyzed here.

12. Page 5-96, Visual/Aesthetic Changes. The statements regarding visual/aesthetic changes are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. The analysis of visual/aesthetic changes makes no reference to the significant adverse changes associated with the Second-to-Mission alignment. As discussed above (see in particular Downtown Plan policies 13-16) and in Exhibit A, the loss of the 301 Mission Street project and limited reuse opportunities would result in a substantially changed visual environment, both in terms of the street-

level environment and the Downtown skyline. The 301 Mission Street project must be included in the photomontages as a reasonably foreseeable project.

13. Pages 5-109 — 5-137, Transit, Traffic and Parking, Including During Construction. The statements regarding transit, traffic and parking (including during construction) are conclusory and unsupported by evidence as they relate to the Second-to-Mission alignment. This section contains no analysis of transit, traffic and parking impacts associated with that alignment. Due to the vague Project Description, it is difficult to identify or assess those impacts. However, at a minimum, they include substantial disruption to Mission Street (a General Plan Transit Preferential Street) while construction occurs at that location. Construction would presumably progress block-by-block along Mission Street, over a long period of time, with no street parking during construction and significant potential for disruption of MUNI operations both above and below grade. The impact of these closures would be substantial and must be discussed.

14. Pages 5-138 — 5-187, Construction Impacts. The DEIS/DEIR is inadequate in its description of the impacts of demolition, underpinning, surface rail line and station construction and support of adjacent structures that would be required for the Second-to-Mission alignment. These topics receive scant mention on pages 5-144 and 5-148 with no impacts discussion. On page 5-166, the text states that construction traffic "could potentially result in temporary delays." The Table on page 5.20-8 suggests that the schedule for both alignments is the same; this analysis appears to ignore impacts from the closure of Mission Street west of Beale Street. The limited nature of the impact is unsupported by analysis, particularly with respect to street closures necessary for construction of the Second-to-Mission alignment. Why is Mission Street west of Beale Street omitted from the analysis? Impacts to this section of Mission Street (including 301 Mission Street) must be addressed in terms of driveways blocked during construction, on-street parking removal, impacts to businesses, utilities relocation and construction noise and vibration.

Table 5.20-4 estimates the amount of excavation materials. Given the extent of excavation required under structures at the terminus of Mission Street, the numbers for the Mission Street alignment are not credible. Even if these numbers were accurate, the Second-to-Mission alignment would involve about 10% more excavation. How is this accounted for in the financial analysis? Again, all of this information must be provided.

15. Chapter 6, Fiscal Analysis. The DEIS/DEIR does not identify specific source documents or make those documents available to the public. For example, where is the cited but undescribed Seifel Consulting and Nancy Whelan Associates tax increment analysis? Specific information regarding that information and acquisition,

relocation, resale, and mid-point of real estate costs are essential to adequate analysis, but we are advised they do not exist. The acquisition costs associated with the Second-to-Mission alignment have been significantly underestimated, as have the costs of business disruptions and tax revenue loss. On page 6-8, the tax increment assumptions remain constant for all scenarios. Clearly, there would be a substantial difference between the two alignments in light of impacts on the 301 Mission Street project. The Tables on pages 6-4 and 6-8 must both be revised to account for increased operating expenses for the two platforms and separate tracks in the Second-to-Mission alignment. Finally, the analysis does not account for the costs of acquiring City subsurface land — is the City donating this land and, if not, what is the acquisition cost?

The project is only in its initial stages of identifying potential funding sources, and the vast majority of funds are as of yet unsecured, but the document does not discuss funding feasibility or timing. The entire financial and feasibility analysis is meaningless without this information, particularly since factors such as the "midpoint of real estate costs" are central to that analysis. The financial information drives phasing and its physical impacts, which is a fundamental component of the Project Description and impacts analysis.

In conclusion, we reiterate our concurrence in the DEIS/DEIR's determination regarding the Environmentally Superior Alternative, which includes the Second-to-Main alignment. While both alignments preserve the opportunity for a future cross bay high speed rail connection in the future, only the Second-to-Main alignment preserves the 301 Mission project and its contributions to the Transbay project. By contrast, the Second-to-Mission project results in numerous adverse impacts, including the loss of the 301 Mission Street project and its associated benefits, without any identified advantages . Accordingly, we request selection of the Environmentally Superior Alternative as the Locally Preferred Alternative.

Thank you for your consideration.

Very truly yours,

Tay C. Via

Tay C. Via
COBLENTZ, PATCH, DUFFY & BASS, LLP

TCV/wpd

cc: Members, Pennisula Corridor Joint Powers Board
Michael J. Scanlon, Executive Director, Peninsula Corridor Joint Powers Board
Leslie T. Rogers, Region IX Administrator, U.S. Department of Transportation, Federal Transit Administration
Jose Campos, Planning Supervisor, San Francisco Redevelopment Agency
Jerome Wiggins, U.S. Department of Transportation, Federal Transit Administration
Joan Kugler, City and County of San Francisco Planning Department

EXHIBIT A

EXECUTIVE SUMMARY OF 301 MISSION STREET PROJECT TRANSBAY/CALTRAIN EXTENSION ALTERNATIVES

1. **Analysis of Project with Modifications to Accommodate Conceptual Plan for Transbay Terminal.** (Alternative E, Technical Letter Nos. 1, 2.) Feasible.

   - Basic Project Description: Modifies project to reflect preliminary conceptual plan for a new Transbay Terminal only, assuming Second-to-Main alignment (Plan DTX-ALT1B-40 dated 7/21/02, 7/29/02). Involves acquisition of a southerly portion of project site to accommodate Transbay Terminal access tunnel.

   - Engineering Approach: 45' deep tunnel would encroach approximately 5' into 301 Mission Street site. Requires replacement of temporary piles with new approximately 18-24" thick foundation wall constructed as part of the 301 Mission Street project. Assumes isolation of the tunnel from the 301 Mission Street structure with load-bearing wall of the 301 Mission Street project cantilevering beyond newly-positioned foundation wall.

   - Project Impacts: Loss of approximately 3'6" along the 275' length of site, or 4,000 gross square feet over below-grade levels. Elimination of about 30-40 subterranean parking stalls and approximately 500 square feet each of storage and mechanical space.

   - Increased Costs: Approximately $400,000-600,000, plus additional transactional and coordination costs, in addition to loss of site area and related program space.

   - Conclusion: Provided that cost and construction issues can be adequately addressed, appears feasible from construction and program perspective.

2. **Analysis of Project Reconfigured to Accommodate the Second-to-Mission Street Caltrain Extension.**

   (a) **Analysis of Tunnel 45' Below Grade, Column-Free.** (Variant F1, Technical Letter Nos. 1 and 2.) Infeasible.

   - Basic Project Description: Based on preliminary conceptual plan No. DTX-ALT2B-40, 8/1/02. Bottom of tunnel 45' below grade, top at grade, all column-free zone.

   - Engineering Approach: 301 Mission Street preserves path for future Caltrain terminal; building supported on very deep concrete transfer girder above grade at top of future tunnel roof and pedestrian mezzanine. Transfer girder of about 30' thick, with approximately 76 piles on both

east and west sides. Site cannot accommodate this number of piles, even assuming encroachment into sidewalk area.

- Program Impacts: Above-grade, 30' mat replaces first two floors of project program, including atrium and associated publicly-accessible open space, retail/restaurant and residential/hotel lobbies. Lobbies relocated to third floor, with two escalators and four additional elevators required for access. Structural mat eliminates main vehicular and pedestrian drop-off and loading areas, relocated to Beale Street. Reduced program: 400 to about 100 parking spaces, 11,300 gsf to 2,000 gsf open space at the ground floor, and 10,000 gsf to 4,500 gsf restaurant/retail.

- Urban Design Issues: Ground floor-activating features eliminated and replaced with structural mat reading as a blank concrete three-story wall from street; physical and visual barrier along Fremont and Mission Streets; only remaining program at ground floor is office lobby and partial ground floor retail, with remaining ground floor area dedicated to loading, vehicle ramps and mechanical shafts.

- Increased Costs: About $35,750,000-$43,250,000, plus incremental transaction and coordination costs. See Technical Letters No. 3 and 4.

- Conclusion: Infeasible due to impacts on program, urban design, timing and cost.

Notes:

- Could also be revised to include construction of Caltrain tunnel as part of 301 Mission Street project's scope. Involves same feasibility issues as Variant F1, additional costs of tunnel construction, plus final construction drawings for tunnel and funding required by first quarter of 2003.

- If assume reduced development program (roughly one-half of the proposed project), Variant remains infeasible. Mat is reduced, but still 15' above grade, creating same conflicts as Variant F1, and eliminating about 400,000 gross square feet of program, including roughly 130 units of housing and 100 hotel rooms.

(b) **Analysis of Reduced Development, "Remainder" Site.** (Variant F2, Technical Letter Nos. 1 and 2.) Infeasible.

- Basic Project Description: Assumes site is reduced to only about 17,000 gross square feet "remainder" portion of the 301 Mission Street site (outside of the Caltrain alignment) available as building site, with balance used for vehicular access and landscaping only. Entails loss of approximately 2/3 of site.

- Program Impacts: Buildable area reduced from about 900,498 to 300,000 gross square feet. Due to relocation of ground floor functions, loss of the 6,400 gsf central atrium, 7,200 gsf garden terrace, 4,500 gross square feet retail use and reduction in residential and hotel public lobby spaces. Substantial portions of residential and hotel elements also eliminated in light of over 600,000 gsf (almost 2/3) reduction in buildable area.

- Urban Design Issues: Similar to Variant F1.

- Conclusion: Infeasible due to substantial reduction in program (and associated costs), timing and conflicts with urban design policies as described for Variant F1.

(c) **Analysis of Revised Caltrain Plan (lower tunnel; potential column zones).** (Variant F3, Technical Letter Nos. 3 and 4.) Infeasible.

- Basic Project Description: Based upon revised plans Nos. C/01-C/03 dated November 4, 2002, modified to (i) show lower tunnel floor (64') with top of tunnel 18' below grade and (ii) identify certain areas where columns placed to support 301 Mission Street project's superstructure.

- Engineering Approach: Support 301 Mission Street superstructure on 10' concrete mat reinforced with structural beams and conventional reinforcement, with isolation of below grade structure from tunnel. Conventional load-resisting system consisting of 3-5' diameter columns at about 15' on center.

- Program Impacts: Below-grade program impacts result in loss of about 1/3 of gsf available for parking and building services and other support space. Reconfiguration results in loss of about 243 stalls, leaving only 157 stalls for 320 residential units, and no spaces for visitors and commercial uses (loss of about 60% of the parking spaces). About 84,712 square feet of mechanical and building services requires above-grade relocation. This absorbs eight floors or about 64 units (20% of the project's total). Lost units potentially added to office tower, but building loses efficiency as the elevator core enlarges significantly, with substantial duplication of mechanical systems. Therefore, assume replacement of lost units with about six floors of new office space, increasing height of office tower from 126' to 209'. Loading facilities also configured to provide access to elevator core for residential tower's loading facilities from third floor of office building, with service corridor traversing public atrium.

- Urban Design Issues: Requires servicing residential tower through office elevator; sound and vibration concerns from above-grade mechanical equipment; and numerous design and operational challenges to Caltrain. Service corridor runs between residential and office buildings traversing public atrium, disrupting skylight views. Project's expression and

connection to street disrupted by louvers required to screen mechanical functions. Louvers replace vision glass, an important element of the design/visual continuity. Additional office floors dramatically change scale and daylight in atrium and outdoor space.

- Increased Costs: About $29,500,000-$34,250,000 plus incremental transaction and coordination costs. See Technical Letters No. 3 and 4.

- Conclusion: Infeasible for a variety of functional, urban design, timing and cost issues.

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September 10, 2002

Mr. Glenn Rescalvo
Gary Edward Handel & Associates
735 Market Street, 2nd Floor
San Francisco, CA 94103

Subject: Evaluation of Caltrain Alternates for the Downtown Terminal Expansion
301 Mission Street, San Francisco, CA

Dear Glenn:

We are pleased to submit this preliminary evaluation report summarizing the results of an impact study we performed analyzing the proposed Caltrain downtown terminal expansion and the high-rise building project at 301 Mission Street. The drawings containing the parameters for the proposed Caltrain terminal expansion were prepared and submitted for our review by Computer Design Solutions. There are two configurations, both of which require acquisition of a portion of the project site. As discussed below, based upon the plans provided by the Transbay Terminal Consultants, Alternate I could be accommodated, but at an increased cost to the 301 Mission Street project. Alternate II is infeasible based upon the timing, technical and economic factors identified in our analysis.

Alternate I:

Alternate I relates to the new Transbay Terminal. Drawing DTX-ALT1B-40, dated 7/31/02, shows a plan view of this alternate. A cross section through this scheme is shown on Section AA dated 7/29/02. This plan comprises a proposed new tunnel (45 ft. deep) to be constructed under Mission Street, running parallel to the south lot line of the 301 Mission street property. The temporary shoring wall of the Caltrain tunnel structure, as shown in Section AA, is located approximately 5 feet from the property line of the subject 301 Mission building project. We propose that the temporary piles indicated on Section AA be eliminated in lieu of a new 18- to 24-inch thick foundation wall that would be constructed as a part of the 301 Mission Street project. The Caltrain tunnel wall will need to be isolated from this foundation wall so that the lateral pressure imposed by 310 Mission street project structure is not transferred to the Caltrain structure. We estimate that an isolation joint filled with a compressible material of approximately 8- to 12-inches in width will be required between the two walls. In addition to being designed to support the 301 Mission Street superstructure, this foundation wall system would also be required to be designed to resist all anticipated loads associated with the construction of the Caltrain tunnel.

The above-grade structure for the 301 Mission Street project is comprised of a two-story load-bearing wall situated at the property line that will need to be supported by the ground floor structural slab, which would cantilever out beyond the newly-positioned foundation wall. This condition will require the installation of a continuous corbel along the top of the foundation wall to provide adequate and continuous support for the superstructure.

Based upon the above noted constraints, we estimate that the approximate additional cost to design and construct the foundation wall to resist any anticipated Caltrain tunnel construction loads and to design and construct the corbel on the top of this wall to support the cantilevered ground floor slab will be range from $400,000 to $600,000. Of course, this would also involve agreements and coordination between the parties that would result in additional expense. We emphasize that this is a preliminary conceptual cost estimate based upon the plans provided, and that the final cost of construction may vary significantly from this estimate. Furthermore, any modifications to those plans would also increase this cost.

Alternate II:

Alternate II is the Second-to-Mission Street Caltrain extension. Drawing DTX-ALT2B-40, dated 8/1/02, shows a plan view of this alternate. This alternative would also involve agreements and coordination between the parties that would result in additional expense. There are several ways to analyze the impacts of this alternative.

Alternate IIA would require that 301 Mission Street project provide the necessary clearances to accommodate a 90-foot wide tunnel (train track and two platforms) under the high rise structure's base. Figure 1 shows the site plan with building footprint overlaid on the proposed Caltrain tunnel.

This proposed alternate will require that the entire 301 Mission building be supported on a very deep concrete transfer girder (concrete mat or a structural steel grillage system) spanning across the Caltrain tunnel. Section AA shows that the top of the tunnel roof (including the mezzanine structure) is located approximately at grade. Therefore, the entire depth of this transfer girder will be above grade. A layer of compressible material of up to 3-feet in thickness will be required to be installed between the underside of the transfer girder foundation mat and the Caltrain tunnel roof in order to isolate the Caltrain structure from the building. Due to site geometry constraints imposed by the proposed Alternate II Caltrain alignment, this deep transfer girder can only be supported on the east and west ends of the project site. No supports can be provided along the north and south direction of the mat as the tunnel continues beyond the project site.

As part of our evaluation of proposed Alternate II, we have performed preliminary structural analyses to establish design parameters for the transfer girder support system that would both span the Caltrain tunnel and provide requisite support for the 301 Mission building's superstructure. For the purposes of this analysis, we modeled a concrete mat foundation to act as the transfer girder. The intent was to determine equivalent stiffness and strength of the transfer girder system required to span across the Caltrain tunnel and resist loads imposed by the superstructure. The final material, type and configuration of this transfer girder will be selected based upon contractibility and design requirements.

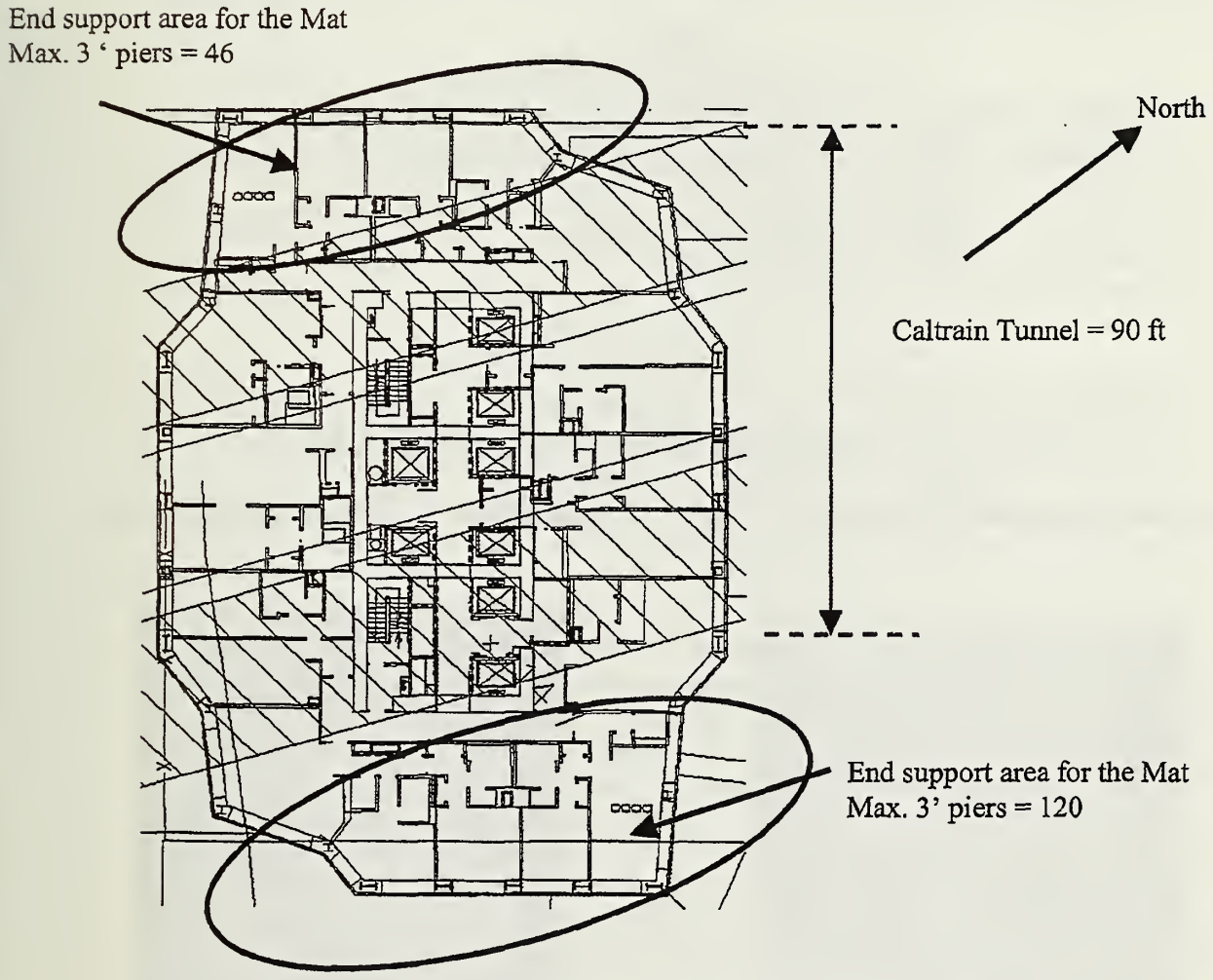

Figure 1: Building Foot Print Overlaid with Caltrain Tunnel

Figure 2 shows a schematic of a finite element structural model that was developed to represent a thick reinforced-concrete mat supported along its edges in one direction. The edge support conditions were approximately modeled in order to capture reasonable estimates for the reactions (e.g. tension, compression). The building core was modeled as line loads in order to capture the transfer of seismic lateral load moments from the building's superstructure to the mat. The non-seismic gravity column system was modeled by evenly distributing the building's gravity loads across the mat. Based on these estimated seismic overturning and gravity loads, the vertical deflections of the mat and internal flexural stresses were then computed.

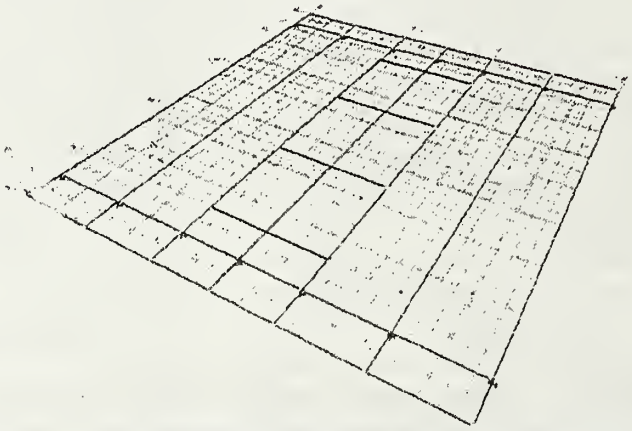

Figure 2: Finite Element model of the Foundation Mat Slab

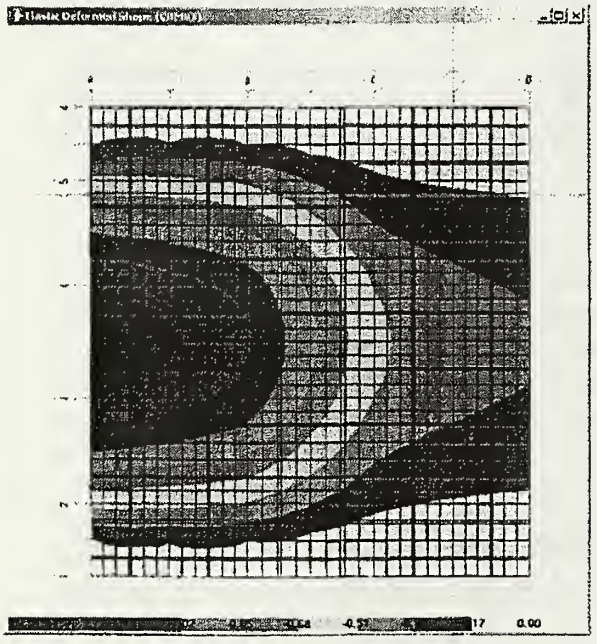

Figure 3: Deformations for 15 ft. thick Mat

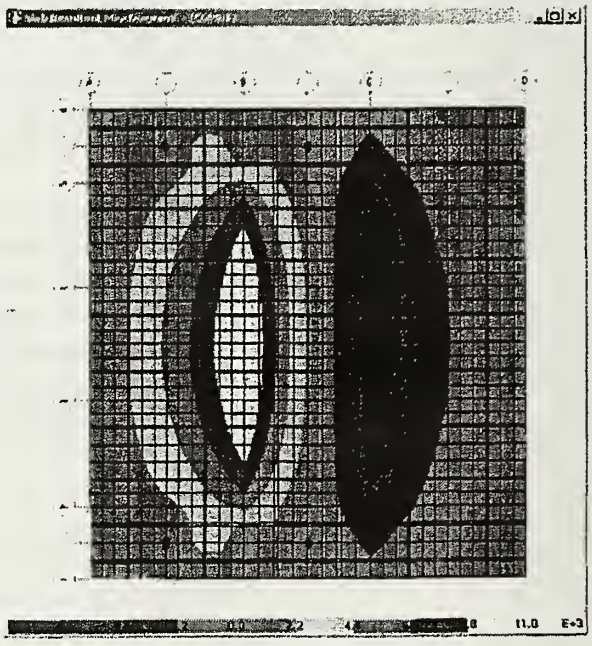

Figure 4: Flexural Stresses for 15 ft. thick mat

Figures 3 and 4 show deformations and flexural stresses for a proposed 15-foot thick transfer girder mat. As the mat deforms, it causes rotation at the base of the high-rise tower, which in turn results in a lateral deflection at the top of the 630-foot tall tower.

Tables 1 and 2 present a summary of the deformations, stresses and tower tip deflection for three different mat thicknesses (8 ft., 15 ft., and 30 ft.). Table 1 shows that the tower tip deflection for an 8-foot thick mat is approximately 53 inches, for a 15-ft. thick mat is 12.4 inches, and for a 30-ft. thick mat is approximately 3.6 inches. Therefore, to reasonably limit the tower tip deflection due to foundation rocking, stiffness and strength required for the transfer girder needs to be equivalent to a concrete mat of approximately 30-feet thick.

Table 1: (Parallel to Mission Street) X- direction

Mat Thick. (ft)	Vertical Differential Displacement (in.)	Tower Tip Displacement (in.)	Mxx (kip-ft/ft)	End Reaction Kips	No of Piers Required
8	4.40	53.31	10740	60109	43
15	1.02	12.36	11630	65520	46
30	0.30	3.63	12807	78625	56

Table 2: (Perpendicular to Mission Street) X- direction

Mat Thick. (ft)	Vertical Differential Displacement (in.)	Tower Tip Displacement (in.)	Mxx (kip-ft/ft)	End Reaction Kips	No of Piers Required
8	0.65	10.64	6000	88022	62
15	0.19	3.11	11000	94137	67
30	0.08	1.37	16800	107242	76

The number of piles required to support the foundation mat along <u>each</u> of its two sides are shown in Table 1 and 2. For calculational purposes, we have assumed that a number of individual 3-foot diameter drilled piers (each 120-ft. long) will be required to provide sufficient tension and compression capacity. A total of approximately 76 drilled piers will be required to support each side (east and west) of the 30-foot thick mat. Based upon the geometry constraints illustrated in Figure 1, however, a maximum of only 46 piers can be installed along the west side of the tunnel (this includes encroaching into the sidewalk area outside of the property line). If all the piers were installed within the property lines of the project, a total of 18 drilled piers can be installed along the west side of the tunnel. Therefore, all 76 piers cannot be installed on the west side of the tunnel even after encroaching into the sidewalk area outside the property line.

In summary, there is not sufficient physical space within the confines of the 301 Mission Street project site to install required number of required drilled piers to support the foundation mat spanning across the Caltrain tunnel.

A brief summary of our findings is presented below.

1. The stiffness and strength of the transfer girder system for supporting the building's superstructure and for minimizing tower tip deflections due to foundation rocking are required to be equivalent to approximately a 30 feet thick concrete mat. A transfer element of this required thickness will essentially eliminate the first floor of the building and all proposed floors below grade. The cost of constructing such a mat will be significantly higher than the cost of the basic foundation system that would have been required in the absence of the Caltrain tunnel.

2. The large number of drilled piers required to be installed at the ends of the foundation will necessitate going outside of the bounds of the existing building property line. However, after utilizing the space under the sidewalk on the west side of the tunnel, there is still not sufficient room to physically install the required number of piles.

3. With a 30-foot thick mat, the seismic deflection at the top of the tower resulting from foundation mat overturning is about 3.6 inches. This deflection needs to be added to the overall seismic deflections of the building superstructure. To incorporate these deformations, the conventional structural systems being considered (either reinforced concrete shear wall core or steel braced frame core) may not be sufficiently stiff and strong within reasonable member sizes to allow for proper architectural planning and to achieve the desired building functions, especially around the building core. Therefore, these systems will need to be supplemented by non-conventional lateral load-resisting methods such as base-isolation or active damping devices. This will result in a significant additional cost to the 301 Mission building project. We estimate that this additional cost will be in the range of 25% to 35% of the base structural cost.

Based upon the above noted constraints in the design and construction of the foundation system, we estimate the additional costs for the construction to be as follows:

Drilled piers (152 piers, 120 ft. long) = $4 to $6 Million
30 ft. thick transfer girder mat slab = $5 to $7 Million

Total additional cost of foundation system = $9 to $13 Million.

Please note that these costs are based upon preliminary conceptual estimate and the actual costs may vary significantly from this estimate. Based upon the results of the preliminary analysis described above, it appears that it is neither physically nor economically possible to provide for a sufficiently thick transfer element to support the building superstructure

and to span across the Caltrain tunnel. This conclusion is based on the large number of drilled piers that will be required to support the proposed tower structure, coupled with the fact that the structural solution will then need to be augmented with non-conventional solutions, and the additional costs for incorporating this Caltrain Alternate II in the design will be significant. Beyond the cost issues, this Alternate II is infeasible because the required number of piles cannot be accommodated on-site, even assuming the use of the adjacent sidewalk.

Alternate II B:

This alternate assumes the following:

1. The proposed building will be same as the Alternate IIA.

2. The foundation system will be same as the Alternate IIA and the Caltrain tunnel will be isolated from the building structure.

3. The 301 Mission Street project sponsor not only provides the necessary clearances but also will construct the Caltrain tunnel under the project.

This alternate requires that Caltrain's plans are finalized and approved before the construction of the project can begin. This alternate also requires that the tunnel excavation and construction of the tunnel structure be completed prior to the start of building construction. Based upon our review of the plans and understanding of the construction schedule, these requirements are infeasible. It also involves the same issues as Alternate IIA.

Alternate II C:

This alternate assumes a substantially reduced 301 Mission Street project:

1. The proposed building height will be reduced to half of its originally intended height, or to approximately 300 ft.

2. The foundation system concept will be same as that proposed for Alternate II, and assumes that the Caltrain tunnel will be isolated from the building structure.

Based upon our preliminary analyses, the foundation system required to support the truncated building and to span over the Caltrain tunnel will be similar in concept to the system discussed in Alternate IIA. However, the depth of the transfer foundation mat can be reduced to approximately 15 feet and the total number of piles required to support the transfer foundation mat will also be reduced to approximately 50 on each side of the tunnel. As described in Alternate IIA, a maximum of 46 piers can be installed (this

includes encroaching into the sidewalk area outside of the property line) in the physical space on the west side of the tunnel. If all the piers were installed within the property lines of the project, a total of 18 drilled piers can be installed along the west side of the tunnel. Therefore, all 50 piers cannot be installed on the west side of the tunnel even after encroaching into the sidewalk area outside the property line. All other parameters of design and construction would remain same as in Alternate II. The estimated additional cost (preliminary conceptual cost estimate) of this foundation system will be approximately $6 to $7 million. We understand this would significantly impact the project program. In addition, as with Alternate IIA, the required number of piles could not be accommodated on the site even using the area under the adjacent sidewalks.

Alternate II D:

This alternate assumes the following:

1. The proposed building will be moved to the "remainder" parcel (Lot 1) that is free from Caltrain development.

By relocating the building to Lot 1, the building's structural foundation system will be substantially removed from the Caltrain tunnel, with the exception of a small area in the west corner that is situated over the tunnel. We believe that the structural design for this alternate will be impacted very little by the proposed Caltrain tunnel location.

We hope that the above noted preliminary analyses provide the necessary information that you desire. If you require any further information or clarification regarding the above, please contact us at your convenience.

Sincerely,

DeSimone Consulting Engineers, P.L.L.C.

Niaz A. Nazir, Ph.D., SE
Principal & Project Director

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December 4, 2002

Mr. Glenn Rescalvo, AIA
Gary Edward Handel + Associates
735 Market Street, 2nd Floor
San Francisco, CA 94103

Subject: Evaluation of Caltrain Alternate 2 for the Downtown Terminal Expansion
301 Mission Street Project, San Francisco, California

Reference: Preliminary Evaluation Report - Alternatives for the Downtown Terminal Expansion, Issued by DeSimone Consulting Engineers, September 10, 2002

Dear Glenn:

We are pleased to submit this preliminary evaluation report summarizing the results of a study we performed related to the potential impact of the proposed Caltrain downtown terminal expansion on the planned high-rise building project at 301 Mission Street. Subsequent to the issuance of the above-referenced report and a meeting with the City and Caltrain to present and discuss the findings, Caltrain has made extensive modifications to the underground structure layout both in terms of lowering the tunnel floor and allowing for placement of columns to support the building's superstructure within selected regions of the tunnel. DeSimone Consulting Engineers (DCE) received the following drawings from Caltrain showing these modifications.

Reference Drawings:

Downtown Terminal Expansion - Alternate 2, Proposed Millennium Partners Section:

Drawing No. C101:	Aerial view of the site with proposed Caltrain tunnel
Drawing No. C102:	Aerial view of the site with tunnel and longitudinal profile
Drawing No. C103:	Cross-section across the tunnel and mezzanine showing "No-Column" zone

From a review of these drawings, the following key changes were made to the Caltrain tunnel layout (Alternate 2) as compared to the earlier plans received on July 31, 2002:

1. The bottom of the tunnel floor has been lowered by 19 feet. It is now shown at 64 feet below grade as compared to 45 feet below grade previously.
2. The top of the mezzanine level has been lowered to 18 feet below grade. Previously, the top of the mezzanine roof slab was shown to be at grade. The height of the mezzanine is shown as 20 feet including the roof slab thickness (5-feet thick); whereas, previously it was shown as 15 feet (including the roof slab). Note that for analysis purposes, we have assumed that the mezzanine

roof slab could be incorporated into our design as a part of the building's foundation mat.

3. Provisions were made by Caltrain to allow interior columns to be added through the tunnel structure in certain zones in order to support the building's superstructure.

Summary of DCE Report Dated September 10, 2002

Since early August, DeSimone Consulting Engineers (DCE) have been providing support to both Millennium Partners and Gary Edward Handel + Associates (GEHA) to evaluate the potential structural engineering impacts of two proposed Caltrain terminal expansion alignments on the planned 301 Mission Street building project. Caltrain Alternate 1 passes adjacent to (and slightly encroaching upon) the 301 Mission Street site, and Alternate 2 passes underneath a portion of the site, directly under the planned location for the core of the proposed building tower.

It was concluded that Alternate 1 could be accommodated, but at an increased cost to the 301 Mission Street project. Alternate 2 was judged to be infeasible, based upon the timing, technical and economic factors identified in our analysis. Alternate 2 was found to be infeasible in part due to the stringent constraint required by Caltrain that the building structure span across the entire width of the tunnel (in excess of 90 feet) without any provisions for support of the building superstructure either by or through the Caltrain structure. This resulted in a structural design solution that required the entire superstructure to be supported by a very thick structural mat that would act as transfer element to distribute the gravity as well as lateral forces across a 90-foot wide span to a deep foundation system on either side of the tunnel. Such a solution would result in significant structural, programmatic and cost implications for the project, and was therefore judged to be impractical.

On October 21, we participated in a meeting with Caltrain and the City of San Francisco to present and discuss these results. As a result of this meeting, Caltrain has modified its criteria from what is described in their initial conceptual plan and the Transbay Draft Environmental Impact Statement, and have now provided us with a revised Alternate 2 alignment that is both lowered by 19 feet and delineates specific allowable zones within the proposed tunnel where columns may be placed for support of the building tower.

Analysis Methodology and Summary of Results

A three-dimensional linear model using the ETABS computer program was developed that comprised a complete model for the superstructure as well as the below grade structure. Figure 1 shows the computer model for the entire building. Figure 2 shows a partial 3-D model of the below-grade structure. Figure 3 shows the foundation plan layout indicating both column and shear wall sizes and locations with respect to the Caltrain tunnel.

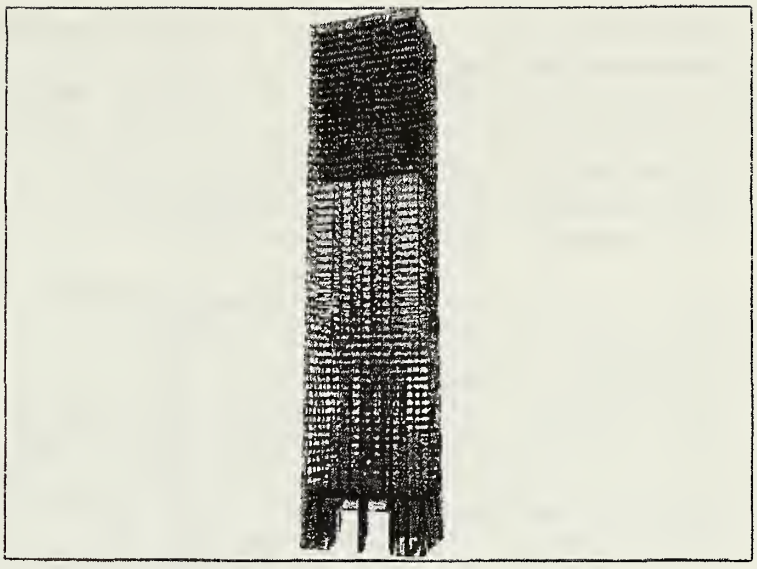


Figure 1: 3-D model of Building

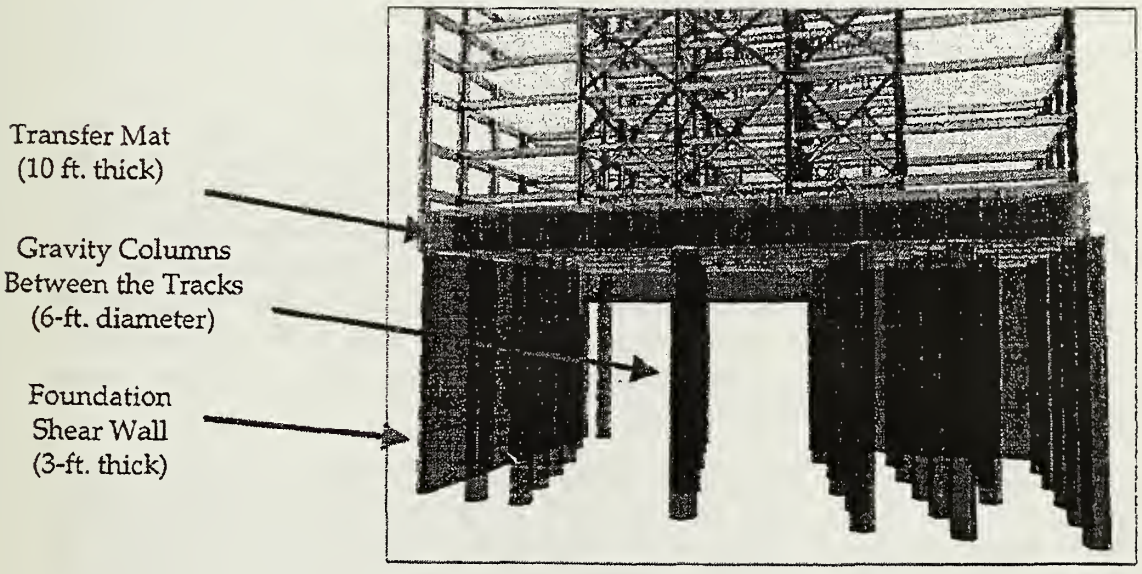


Figure 2: 3-D model of below-grade structure

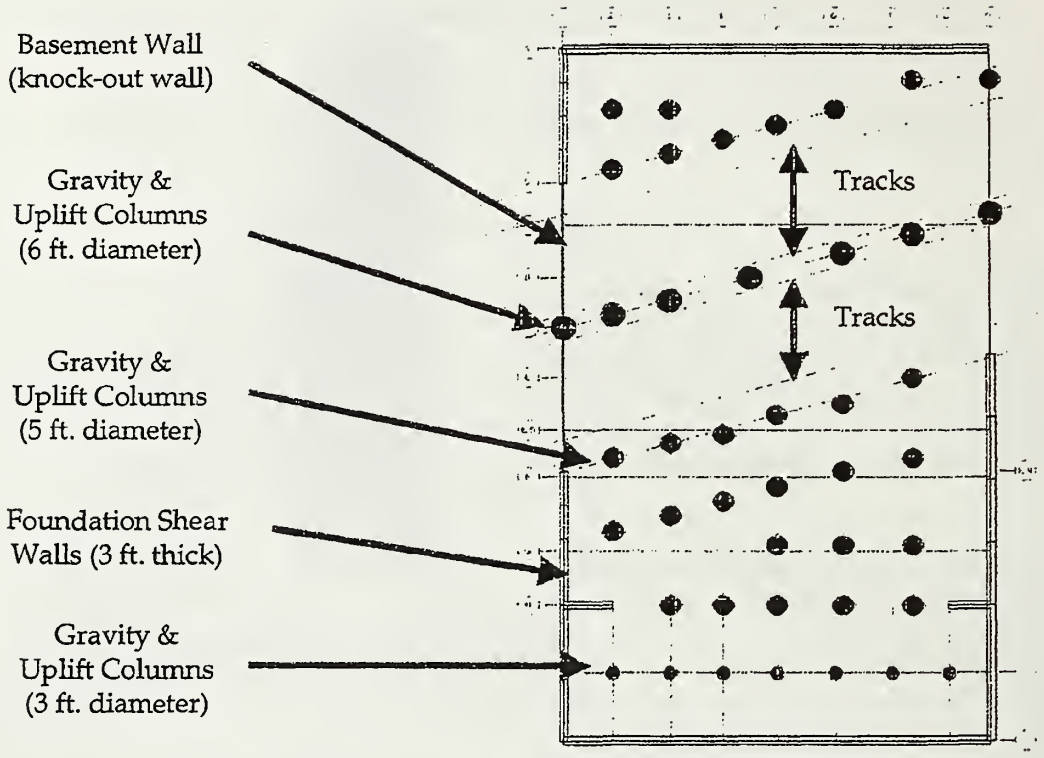


Figure 3: Foundation Plan Layout

The proposed strategy for developing a revised foundation plan for the 301 Mission Street tower comprises supporting the superstructure of the building on a thick concrete mat reinforced with structural steel beams as well as with conventional reinforcement. The concrete mat would then be supported by series of columns below as shown in Figures 2 and 3. The concrete mat acts as transfer girder in bending to transfer the superstructure's gravity and lateral tension/ compression loads to the columns below. The concrete mat also acts as a thick shear plate transferring the superstructure's shear loads to the perimeter concrete shear wall.

It was assumed that the below-grade structure supporting the building would be isolated from the Caltrain structure in order to ensure that the supporting structural system would not impose lateral loads or deformations on the Caltrain structure. As such, a 3 to 4-inch wide isolation joint will need to be provided around all columns and shear walls. Therefore, for analysis purposes, the columns and shear walls supporting the concrete mat were considered to be isolated from the Caltrain structure. As a result, the clear height (i.e. no lateral support) of these elements from the bottom of the concrete mat to the top of the pile caps is assumed to be approximately 46 feet.

The column and shear wall layout of the below-grade structure as shown in Figure 3 does not match up with the layout of the moment frames and braced frames of the superstructure. This condition is defined as a vertical and lateral discontinuity, and according the Code, all structural elements below such discontinuity shall be designed by multiplying the design loads by the "Omega" factor, which in this case will be 2.8. Therefore, the design forces for both the concrete mat and the foundation structure below this mat will need to be increased by 280% to conform to this Code requirement.

The deformations in the superstructure were also monitored to determine the relative increase in story drifts due to the foundation flexibility. The foundation flexibility resulted in an increase in story drift of approximately 20%. Therefore, the superstructure would have to be strengthened over that of the base design (without the Caltrain tunnel) to accommodate this additional flexibility. Based upon the analysis, the superstructure of the building can be stiffened by using a conventional dual lateral load-resisting system. However, this will result in an increased structural cost to the project. We estimate that this additional cost will be in the range of 10 to 15% of the base structural cost, or about $3,500,000 - $5,250,000.

Using the above methodology, the member sizes of the key structural foundation support elements were determined and are as shown in Figures 2 and 3. The members were sized based upon both strength and stiffness requirements, and as a result, a three (3) foot-thick perimeter foundation shear wall is required to resist the shear loads and provide sufficient stiffness. The shear wall would in turn be supported by a drilled pier foundation below the Caltrain track elevation. The columns situated between the tracks are required to resist the highest load due to the location of braced frame core above, as well as to support the largest unsupported span of the concrete mat. These columns are required to be approximately 6 feet in diameter, located at approximately 15 to 17 feet on center. Similarly, the remaining columns within the tunnel are required to be approximately 5-feet in diameter, with the columns on south side of the tunnel required to be 3-feet in diameter. These columns would probably be designed as composite elements comprised of heavy structural steel shapes encased in concrete in order to optimize their size and spacing.

The concrete mat would be approximately 10-feet thick, and would be comprised of both structural steel and high strength concrete working in composite action. The structural steel shapes would serve to increase the stiffness as well as to improve the constructibility of the thick mat. As mentioned previously, it was assumed that the underside of the concrete mat could serve as the ceiling of the Caltrain mezzanine structure. In the event that Caltrain prefers to have an independently supported mezzanine roof structure, this structure will need to be isolated from the bottom of the foundation mat. In this event, we estimate that a vertical isolation of between 5-to-8 inches will suffice.

Project Programming Impacts

The extensive modifications to the Caltrain tunnel layout plans noted above would result in lowering the mezzanine level to 23 feet below the street level and the train track level to 61 feet below the street level. While this element has not been analyzed or designed, it presents significant challenges for passenger access to the train level from the street and will require a series of escalators, elevators and stairs at steep angles due to the limited horizontal distance available. These escalators, elevators and stairs will also require large openings in the concrete mat of the building which will need to be significantly reinforced and may also need to be thickened at areas around these openings. This will result in additional cost, as well as architectural programming issues, for the 301 Mission Street project.

As noted above, the columns supporting the concrete mat and the superstructure range in size from 3 to 6 feet in diameter with the majority of these columns being of 5 foot diameter. These columns are spaced at approximately 15 feet-on-center. Therefore, the size, location and spacing of these columns within the Caltrain structure present significant security and passenger traffic challenges that Caltrain will need to consider in their program.

Design and Construction Sequence Constraints

There are a number of ways in which the construction of the structural system, including the Caltrain tunnel, could be sequenced. However, it would be particularly impractical and costly to construct the system in a way that would require Caltrain to bore through to create the tunnel after the building project had been completed. Therefore, we assume that prior to construction of the 301 Mission Street superstructure, it would be required to excavate to the bottom of the track elevation (-61 feet), and to provide shoring retention, pier foundations, columns, and shear walls. In addition, concrete knock-out panels at the ends of the tunnel right would need to be provided.

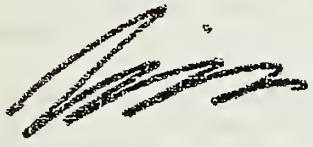
This proposed strategy would require that the conceptual tunnel layout plans made available to the project design team by Caltrain be verified and developed into final drawings and approved by the various agencies that are involved in a very short period of time so that the 301 Mission Street project schedule is not adversely impacted. It would be imperative that these final drawings by Caltrain be made available to the project design team before the project design is further developed into final construction documents. Based upon the 301 Mission Street project schedule and current state of the Caltrain drawings, this would not be possible without delay to the project. This will also require extensive coordination and agreements between the parties that will result in additional cost and schedule impacts. Furthermore, after the 301 Mission Street project design is completed, any material modifications to Caltrain's plans would likely result in significant costs and scheduling delays for the project as they may require redesign of part or all of the project.

Based upon the above noted constraints in the design and construction of the foundation system, we estimate the additional hard cost for the construction will be in the range of $12 to $15 million, which includes tunnel improvements of about $6 to $7 million. The total incremental structural costs of this Alternative as compared to the proposed project are about $15,500,000 to $20,250,000, taking into account both the dual lateral load-resisting system and the foundation costs. Incremental structural costs of Alternative II analyzed in our September 10, 2002 letter as compared to the proposed project are about $9-13 million for foundation work, plus about $8,750,000-$12,250,000 for the load-resisting system, for a total of about $17,750,000 to $25,250,000 in increased structural costs. The costs for Alternative II would increase by an additional $6-$7 million if the tunnel improvements are also assumed. Please note that these costs are based upon a preliminary conceptual estimate and the actual costs may vary significantly from this estimate. This preliminary cost estimate represents bare construction costs only and does not include soft costs or costs associated with delay in project completion due to construction of the structural foundation system presented in this report. These and other associated costs would be incurred in the near future as part of the 301 Mission Street project, but would be the responsibility of the Transbay project. We are unaware of any funding source to cover these costs.

We trust that the above-noted preliminary analyses will provide the necessary information you desire. If you require any further information or clarification regarding the above, please do not hesitate to contact us.

Sincerely,

DeSimone Consulting Engineers, P.L.L.C.



Niaz A. Nazir, Ph.D., S.E.
Principal & Project Director

cc: Mark Farrar (Millennium)
Stephen DeSimone (DCE)
Ron Polivka (DCE)

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September 19, 2002

Mark Farrar
Millennium Partners, SF
720 Market Street, 9th Floor
San Francisco, Ca 94102

Re: 301 Mission Street

Dear Mark:

We have reviewed the two alternatives for the proposed Caltrain "Downtown Terminal Extension" as it relates to the 301 Mission Street Project. As per your request we have evaluated each alternative with respect to the architectural design and programming of the project as it is currently designed. I have also attached a letter from DeSimone Consulting Engineers, P.L.L.C., which raises additional cost and feasibility issues.

Alternate I: drawing DTX-ALT1B-40 dated 7-31-02 and Section A-A dated 7-29-02.
This alternative relates to the new Transbay Terminal and involves acquisition of a southernly portion of the site. The plans indicate that the construction of a forty-five (45 ft.) deep tunnel wall would run parallel and approximately five (5 ft.) within the south lot line of the 301 Mission Street (the project) property. The encroachment of this wall would affect the current diagonal parking stalls along the south wall and perhaps the vehicular passageway/loading dock at ground level. We feel that a redesign for this area of the garage is realistic and that we can make the adjustments to accommodate the design of Caltrain tunnel, at an increased cost provided that the plans are accurate and that there are no major revisions. For the purpose of this analysis we have made the following assumptions: (Refer to figure 1 on page 2 for illustration).

1. As indicated in drawing Section A-A the outside face of the Caltrain foundation wall is aligned 2'-0" over the property line of the project, which we have assumed as a starting point for construction purposes (see figure 1).
2. The temporary piles indicated on Section A-A could be eliminated in lieu of utilizing the project's foundation wall to construct the Caltrain tunnel wall up against.
3. An 8" to 12"construction separation joint would be placed between the outside face of the proposed Caltrain tunnel wall and the foundation wall of the project to mitigate movement between the two structures.
4. The thickness of foundation wall for the project would be approximately 18" to 24".
5. The total dimension width lost within the garage would be 3'-6" over the length of the site which is 275'-0". Approximately 4000 sq. ft. of floor area would be lost over the four levels below grade (Levels B1-B2-B3-B4).
6. The ground level slab will be cantilever over the project's foundation wall towards the property line. This will enable the project to maintain the existing design along the vehicular passageway and loading dock areas.

Given the assumptions described above in Alternative I approximately 30 to 40 parking stalls would be lost throughout the parking garage and approximately 500 sq. ft. of storage and 500 sq. ft. of mechanical space would be lost on Level B1. With respect to the vehicular passageway and loading dock at the ground level, no changes or alterations will be required assuming that cantilever at the ground slab is acceptable.

735 Market Street, 2nd Floor San Francisco CA 94103 tel: 415 495 5660 fax: 415 495 3620 e-mail: geha@geha.com

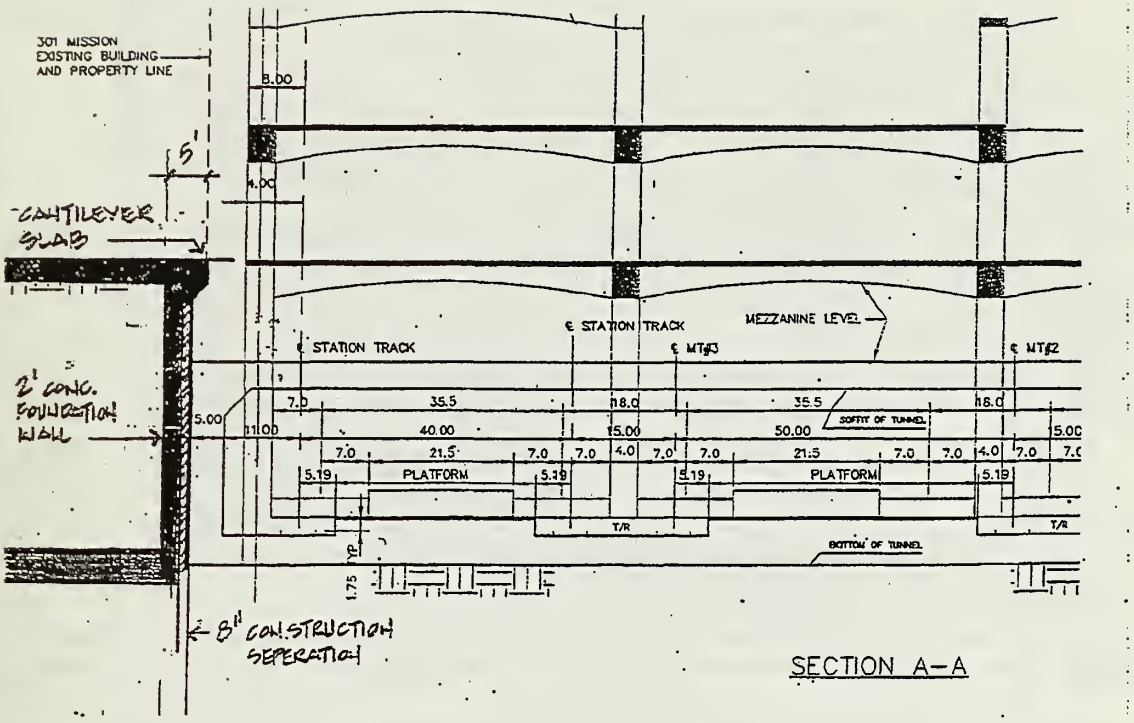

Figure 1

Alternate II: drawing DTX-ALT2B-40 dated 7-31-02.
Alternative II is the Second Street-to-Mission Street Caltrain extension alternative. There are several ways to analyze the impact of the alternative.
The plans indicate that the construction of a forty-five (45 ft.) deep tunnel would traverse directly through the 301 Mission Street property. The location of the tunnel and its physical configuration would significantly alter the remaining below grade buildable area on the property and would cause a redesign of various portions of the project. Judging from these drawings we have assumed that the train tunnel and the pedestrian mezzanine connecting to the bus terminals will make up approximately 2/3 of the entire site. The remaining 1/3 of the site (approximately 17,000 sq. ft.) would be free of any Caltrain construction and could be utilized for the below grade services of 301 Mission Street (see figure 2).

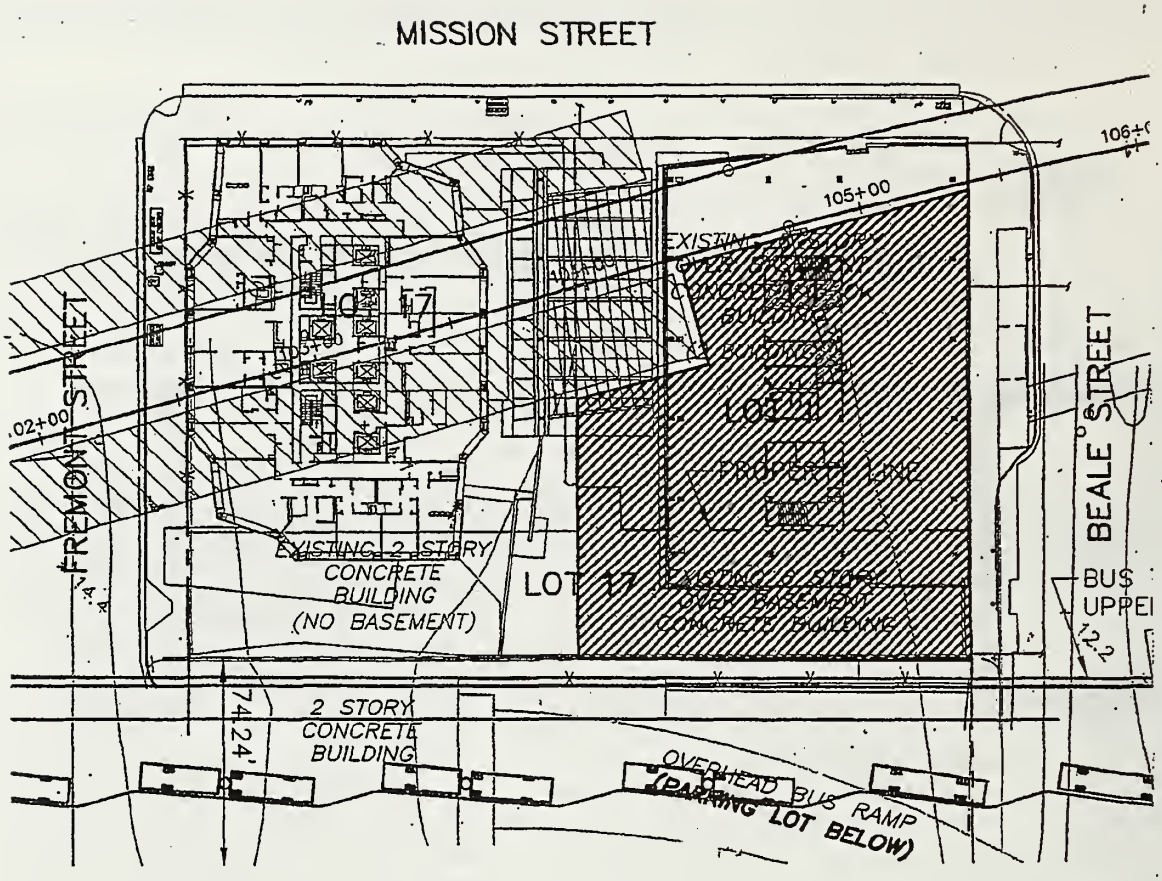

Figure 2

Alternative II A is assuming that the 301 Mission Street project provides the necessary clearances to accommodate the Caltrain tunnel under its base. Given the schedule for 301 Mission Street, it would be necessary to confirm the required clearances now. Above the mezzanine level of the tunnel a 30' deep structural mat would span the width of the tunnel (approximately 90') and piles will be located at the northern and southern outer edges of the mat for the vertical support. Under this scenario the 30' structural mat would extend above the existing grade of the street and the first two floors within the tower footprint would be completely eliminated (see figure 3).. This scheme will also eliminate the main vehicular and pedestrian drop-off Porte Cohere area and the vehicular parking and loading access point from Fremont Street. We also anticipate that the structural mat would have to extend beyond the site in order to facilitate the appropriate number of piles to support the building. According to the D C E report, even with use of the public sidewalk area, the required piles need to support the mat could not be accommodated on such a small area of site. This solution will have tremendous design implications, which make it infeasible for the following reasons:

1. A 30' structural mat eliminates the first two floors of the tower footprint replacing the ground floor and second floor retail and the atriums open space areas. The residential and hotel lobbies will have to be relocated to the third floor. Access to these lobbies will replace the public atrium on that floor as well. This approach will take up approximately 2500 sq. ft. of dedicated atrium open space as well as add a significant amount of cost for additional elevators and escalators in order to shuttle hotels guests and residents up to a third floor lobby.

We can assume that two escalators and four elevators, at a minimum, would be added to the project. The functions designated to the second and third floors of the tower will also need to be relocated or eliminated due to relocating the ground floor functions above the structural mat. Relocating the second and third floor functions to higher floors within the tower will also eliminate 20 hotel units.

2. Approximately 4500 sq. ft.of restaurant and retail space at the ground floor will be eliminated below the tower footprint due to the placement of the structural mat.
3. The vehicular access to the site from Fremont Street for passenger car and loading vehicles will be eliminated due to the configuration of structural mat. In addition, the access to the parking garage ramp, the loading dock and the Porte Cohere, which is the primary pedestrian drop off for the project, will all be eliminated. As a result pedestrians, vehicles and service vehicles would need to access and egress the site from Beale Street. This resolution will significantly affect the ground floor reducing retail, public open space, and the central atrium. Additionally this resolution would create numerous constraints for locating the office elevator core in an area that would functionally be desirable for servicing pedestrians and deliveries.
4. Presently the mechanical and electrical distribution design to the residential tower is routed below grade from various mechanical rooms within the garage. Our design also incorporates a dedicated service corridor for deliveries to be routed to the central elevator cores of the tower from a below grade service elevator adjacent to the loading dock. Due to the location of the Caltrain tunnel and physical constraints of the structural mat, all mechanical and electrical distribution would need to occur outside the footprint of the tower, reducing yet more additional valuable square footage at the ground and second floor. Approximately 1500 sq. ft. of dedicated shaft area will be needed on the ground and second floor to route the mechanical and electrical distribution from below grade up and over the structural mat at the third floor. Additionally, a dedicated service elevator and corridor will need to be added to the design of the atrium to services the residential tower. A total of about 4000 sq. ft. of ground and second floor program area will be replaced by these services.
5. As per the changes to the below grade design the project will significantly be affected by the site constraints and reduce buildable area that is free of any Caltrain construction. Under the current design 123,000 sq. ft. is devoted to parking, 25,000 sq. ft. to ramps and drive aisle, 40,000 sq. ft. to mechanical rooms, and 10,000 sq. ft. to elevator cores, stairs and shafts. Assuming that a vehicular parking ramp from the ground floor to B1 can be accommodated and that an elevator core can be centrally located within the 17,000 sq. ft. parcel, and mechanical rooms can be arranged in some cohesive order, the remaining area that could be dedicated to parking would be significantly reduced and inefficient for a project of this size. Per floor, about 2000 sq. ft. is dedicated to garage exhaust fan room, 2500 sq. ft. for a vehicular ramp, 3000 sq. ft. for mechanical rooms and 2000 sq. ft. for elevator core and stairs. The remaining area dedicated to parking stalls and drive aisles would be approximately 7500 sq. ft., which would allow for roughly 25 parking stalls per floor; totaling approximately 100 cars over four floors verses 400 per our existing design.
6. From an Urban Design standpoint, this alternative would conflict with policies set forth in the downtown plan. The encroachment of the structural mat would prohibit any ground floor activity to occur below the residential tower, and eliminate all ground floor activities and visually create a physical barrier effectively a concrete wall along Fremont and Mission Street. Outdoor public space along Fremont Street and Mission Street would also be eliminated from the open space design.

   As a result of this alternative, the only remaining program at the ground floor that can be salvaged from the existing design would be the office lobby and partial ground floor retail at Mission and Beale Street. The remaining ground floor area would be dedicated to loading, vehicular ramps and mechanical shafts. The second floor of the tower will also be encroached by the structural mat and would not have any program space.

   The central atrium will not exist in its present design. Adding numerous elevators to the project to reroute pedestrians and deliveries to the third would also absorb a significant amount of the floor area (approx. 2500 sq .ft.) The remaining area that could be dedicated to public open space on the ground floor would be approximately 2000 sq. ft. versus 11,300 sq. ft., which our current design indicates.

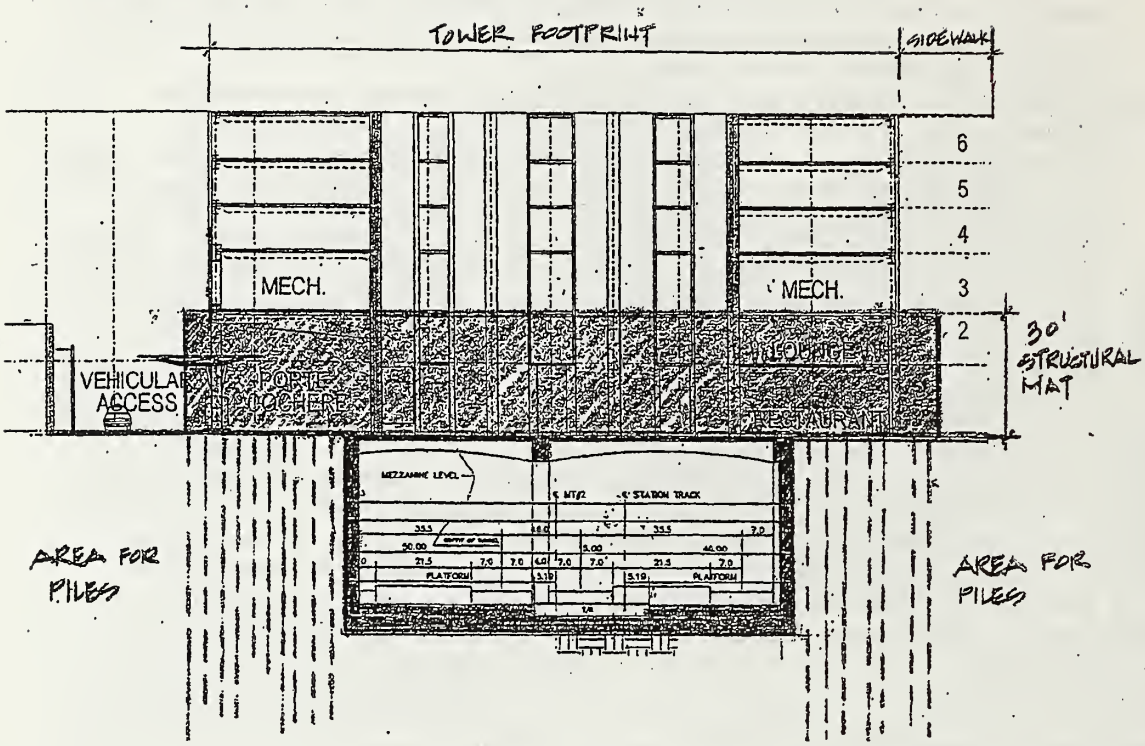

Figure 3

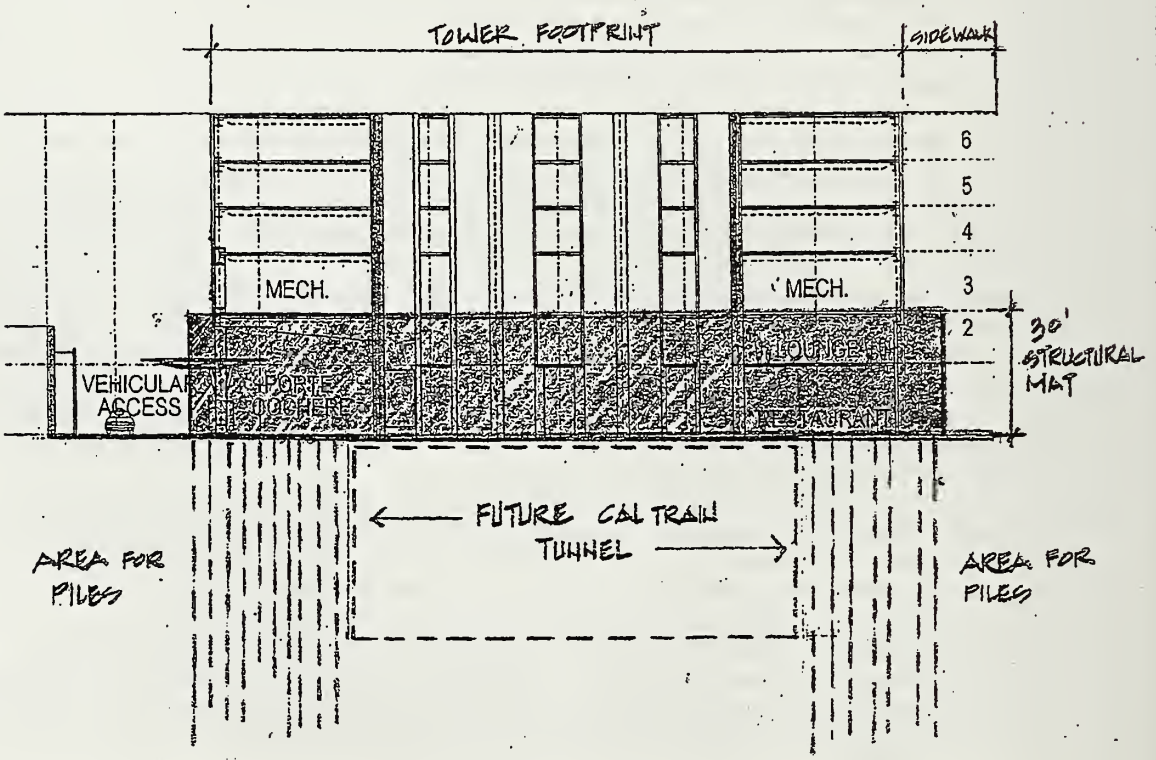

Figure 4

Alternative IIB is assuming that the Caltrain tunnel is constructed as part of the initial 301 Mission Street development. Assuming the configuration of the tunnel is as per drawing DTX-ALT2B-40, the structural foundation system for the project will be as described above in Alternative IIA. A 30' deep structural mat extending above grade supported by numerous piles at both ends of the mat will be constructed as the primary structural foundation system for the tower (see figure 4). As in Alternative IIA the problematic issues with this alternative regarding pedestrian and vehicular access, program reduction, etc., (see comments above) will be identical for Alternative IIB plus additional construction cost and timing issues, making this alternative also infeasible.

Alternative IIC is assuming that the height of the tower is reduced by ½. According to DeSimone Consulting Engineers the thickness of the structural mat could then be reduced to 15' in thickness. The engineers have concluded that, as in Alternative IIA, the required piles cannot be accommodated on the site. Although the thickness is reduced, this alternative is substantially similar to Alternative IIA in its program and urban design impacts. Similar to alternatives IIA and IIB described above the configuration of the mat in this alternative will also interfere with ground floor functions, i.e. residential and hotel lobbies, vehicular access and loading access. In addition to the programmatic issues that this solution creates at the ground floor and below grade, reducing the tower by ½ its height will also eliminate over 400,000 sq. ft. of program, most or all of which would be residential units, depending on the revised program mix. (See figure 5).

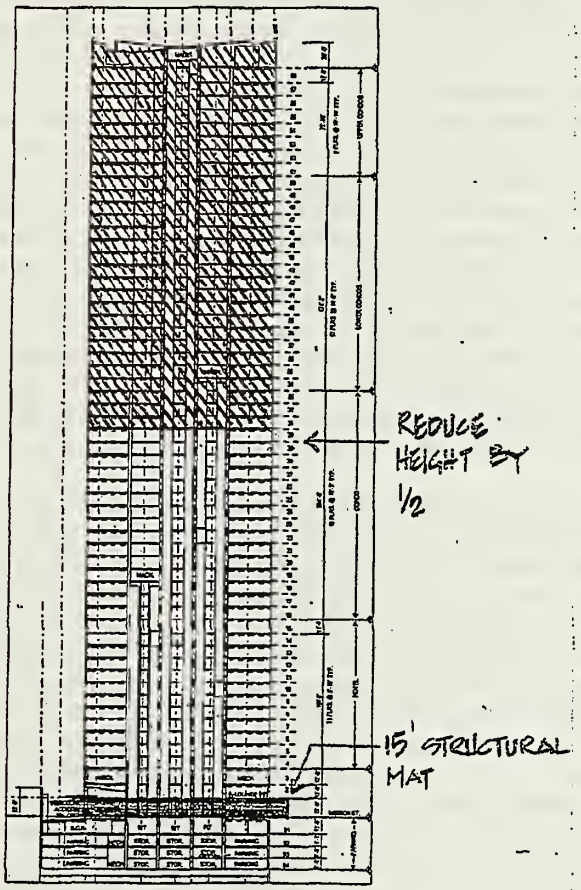

Figure 5

Alternative IID is assuming that the tower location for the project is shifted onto the area of land outside of the Caltrain tunnel. Assuming that the tunnel and pedestrian mezzanine takes up approximately 2/3 of the site, approximately 17,000 sq. ft. of land would remain free of any Caltrain construction (reference figure 2 for buildable area). This area of land would be utilized for construction of the foundation system to support the superstructure of the tower's footprint. This is of course based only on the Conceptual Plan, and additional reductions in the footprint could be necessary to accommodate CalTrains' program. As a result of this condition the project would be infeasible as follows:

1. The location in which the remaining buildable area is located is zoned for a maximum height of 400' (versus 550'), which is the zoning allowable for the current tower location. Assuming that a similar tower floor plan is designed for this location the maximum area of FAR that could be achieved on this parcel of land is approximately 306,000 sq. ft. versus 907,498 sq. ft., which is allowed. This assumes that a project of this size would support a TDR transfer bringing the FAR to 18:1; without the transfer, the square footage would be considerably less.
2. Reducing the height of the project will also have significant impacts on the project presence along the city skyline and would not be in keeping with the Downtown Plan and Planning Department policies regarding density and design at this location. The goals set forth in the Downtown Plan encourage towers of this stature to have a sense of slenderness and add visual interests to the termination of the building and emphasize that added height would improve the appearance of the skyline when viewed from a distance. Furthermore, from a development standpoint a reduction in the height of the residential tower would have a significant impact on potential views and will reduce the value of the overall project.
3. Reducing the buildable area of the project will also have a significant impact on the ground floor functions such as the residential lobbies, loading dock areas, vehicular and parking ramp access. The central atrium would be completely eliminated from the design and retail spaces at the ground floor would be very minimal. The area required to program all the ground floor functions, i.e., the residential lobby, loading dock, vehicular parking ramp, mechanical shaft and back of the house offices for a project of this size is approximately 20,000 sq. ft. This does not include areas dedicated to public open space. Due to the constraints of the reduced site (17,000 sq. ft.) this alternative cannot accommodate these functions. Furthermore, parking below grade will be dramatically impacted due to the irregularity of the site, and the limited amount of parking area that can be dedicated to stalls.

   Elevator shafts, mechanical room, electrical vaults room, and garage ramps will require approximately 8,000 sq. ft. per floor of program area. This allows only 9,000 sq. ft. for parking stalls which is equivalent to 28 stalls per floor, for a total of 112 cars if four levels were constructed. However it is unlikely that four floors would be constructed, given the high cost of excavation and small number of cars each floor could accommodate.
4. With regards to the projects urban identity and public features it will be extremely difficult to accommodate the current design or a similar concept on the reconfigured site. Assuming that the project is built as a residential building all public open space areas would be eliminated from the design and most likely the residential open space component will be designed within the units as balconies and as a dedicated roof top garden. The loading dock, the vehicular ramp and the residential lobby will primarily consume the ground floor. Due to the site constraints, retail spaces, restaurants and interior open space components that add significantly to the urban character of the street and reflect the intention of the Downtown Plan will not be accommodated in this alternative.

Based on our preliminary analysis for Alternative II, we believe that the four variations of this alternative to be infeasible. Given the constraints of the site in conjunction with the project's existing program, the physical character and program would be completely altered and a redesign of the project would need to occur. Even with a redesign, cost, site constraints and other technical considerations would make the current program, or even a substantially similar one, infeasible..

If you have any further questions, please do not hesitate to contact us.

Sincerely,

Glenn G. Rescalvo, AIA
Partner

Gary Edward Handel + Associates
architects

December 6, 2002

Mark Farrar
Millennium Partners, SF
735 Market Street, 3rd Floor
San Francisco, Ca 94103

Re: **Evaluation of Caltrain Alternative 2 for the Downtown Terminal Expansion**
301 Mission Street

Dear Mark:

We have reviewed the revised alternative plan for the proposed Caltrain "Downtown Terminal Extension" (Alternate 2) as it relates to the 301 Mission Street Project. This alternative, which represents the Second Street to Mission Street Caltrain extension, is a revision to the "original Alternative 2" which Caltrain presented to us in mid-October of 2002. It entails drawings C101, C102 and C103 dated November 4, 2002. Per your request we have evaluated this alternative with respect to the architectural design and programming of the project as it is currently designed.

As discussed in the attached DeSimone Consulting Engineers' letter, the revised plan includes a lower tunnel floor and allows for placement of columns to support the building's superstructure. Under this Alternative, only 1/3 of the below-grade area would be available for parking and building support functions. While the entire site above grade is assumed to be available for the development program, the program and design are altered significantly as compared to the project in order to accommodate the relocation of below-grade functions. The following discusses the impact to the building's vertical circulation servicing, parking, support functions, and their subsequent affect on floor area ratios (F.A.R.), residential unit count, office areas, costs and Caltrain pedestrian circulation.

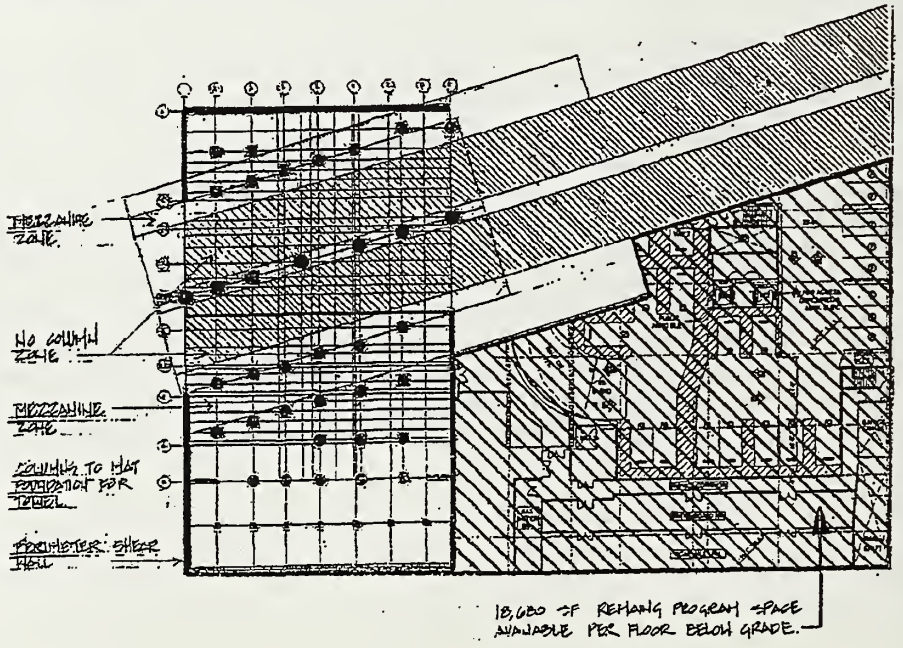

Figure 1

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Residential Tower Elevator Core Servicing

Per the analysis in DiSimone's letter, the top of the tower's residential foundation slab would be placed eight feet beneath the residential tower's grade level. Thus access from the loading facilities, currently below grade would no longer be feasible and access to the elevator core from the loading facilities would need to relocate above grade, on the third floor of the office building. A service corridor would then need to traverse the public atrium and connect with the residential tower core. This enclosed corridor would ruin the purity of the current design. Upon entering the public atrium, pedestrians' views upward towards the skylight roof would be disrupted by the enclosed crossing above (Fig. 2 & 3). This resolution is also problematic from a servicing standpoint, as this entails servicing the residential tower and hotel by means of the office service elevator to reach the residential tower. This is operationally challenging, inefficient and creates numerous security concerns.

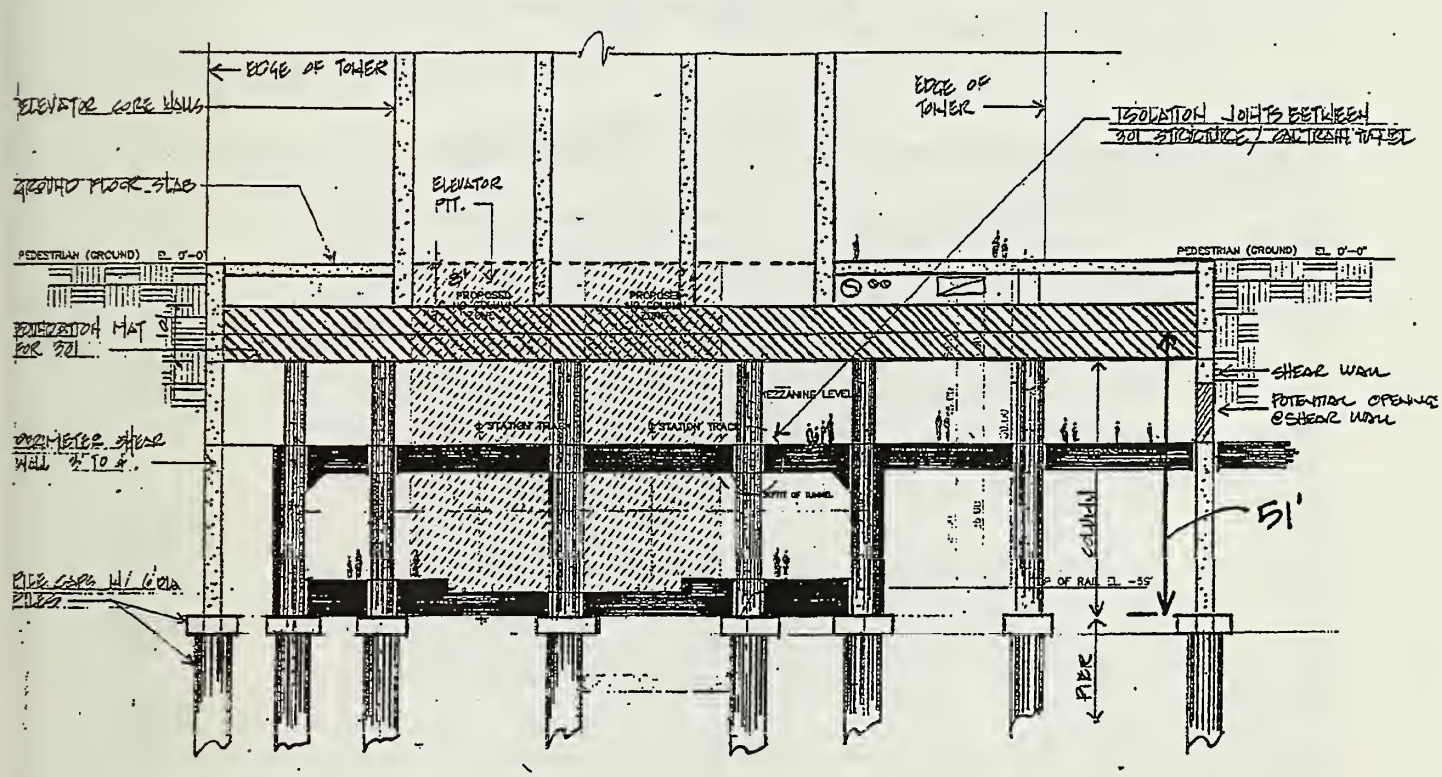


Figure 2

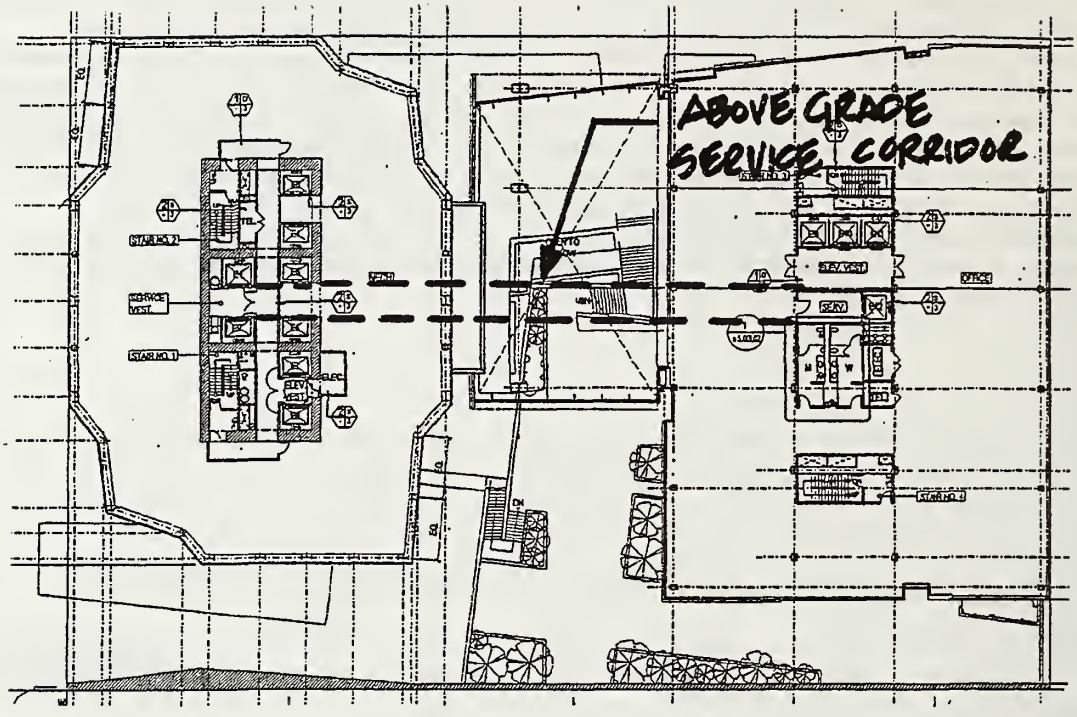
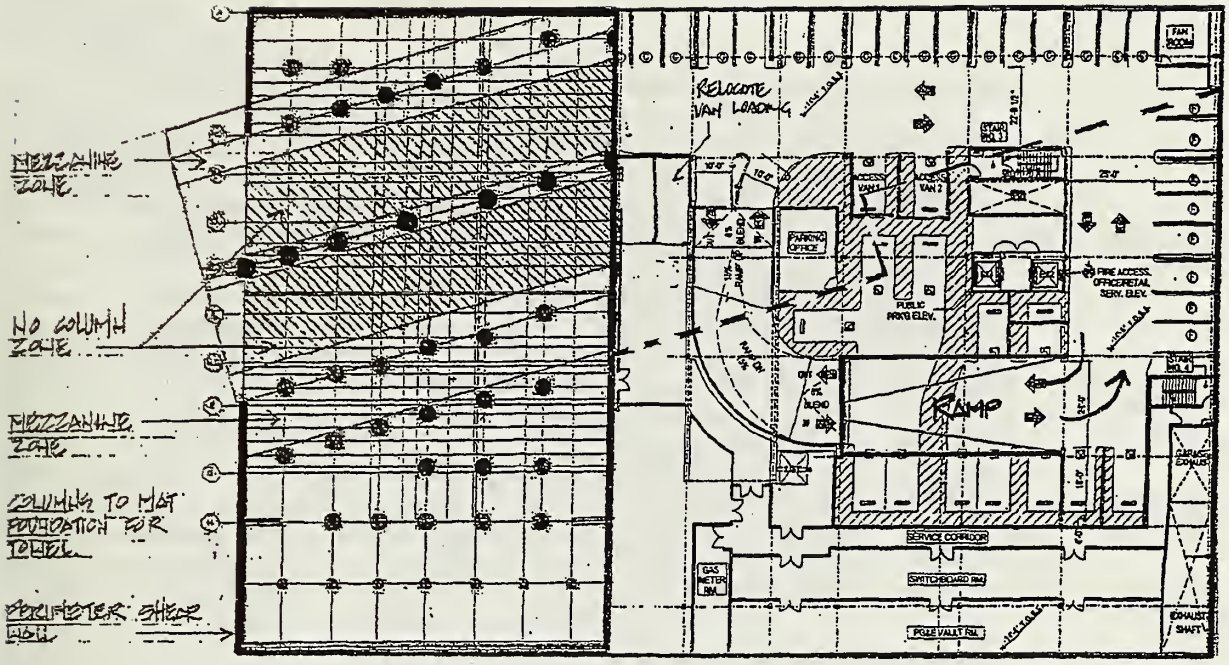


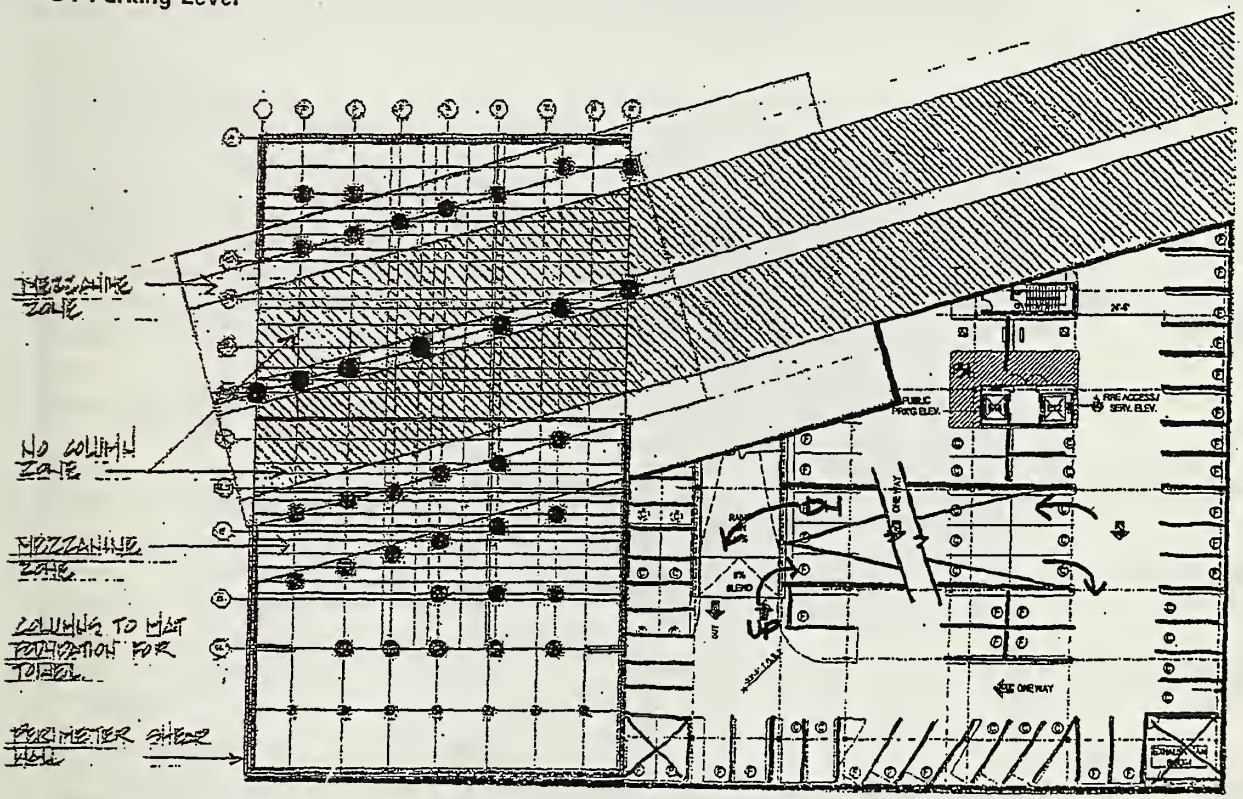
Figure 3

Parking Impact

Below grade Levels B1, B2, B3 and B4 would all be significantly reduced by the incorporation of the Caltrain alternative and subsequently would need to be completely redesigned. As noted on figure 4, the remaining 18,680 square feet of area would need to be devoted only to parking ramps and stalls. Given the awkwardness of the layout, maneuvering and efficiency of parking will result in a loss of 243 stalls leaving the project with only 157 stalls for 320 residential units, and no spaces for visitors and commercial uses. In addition to the loss of 60% of the parking stalls, building support functions would need to be located elsewhere within the project as discussed next.

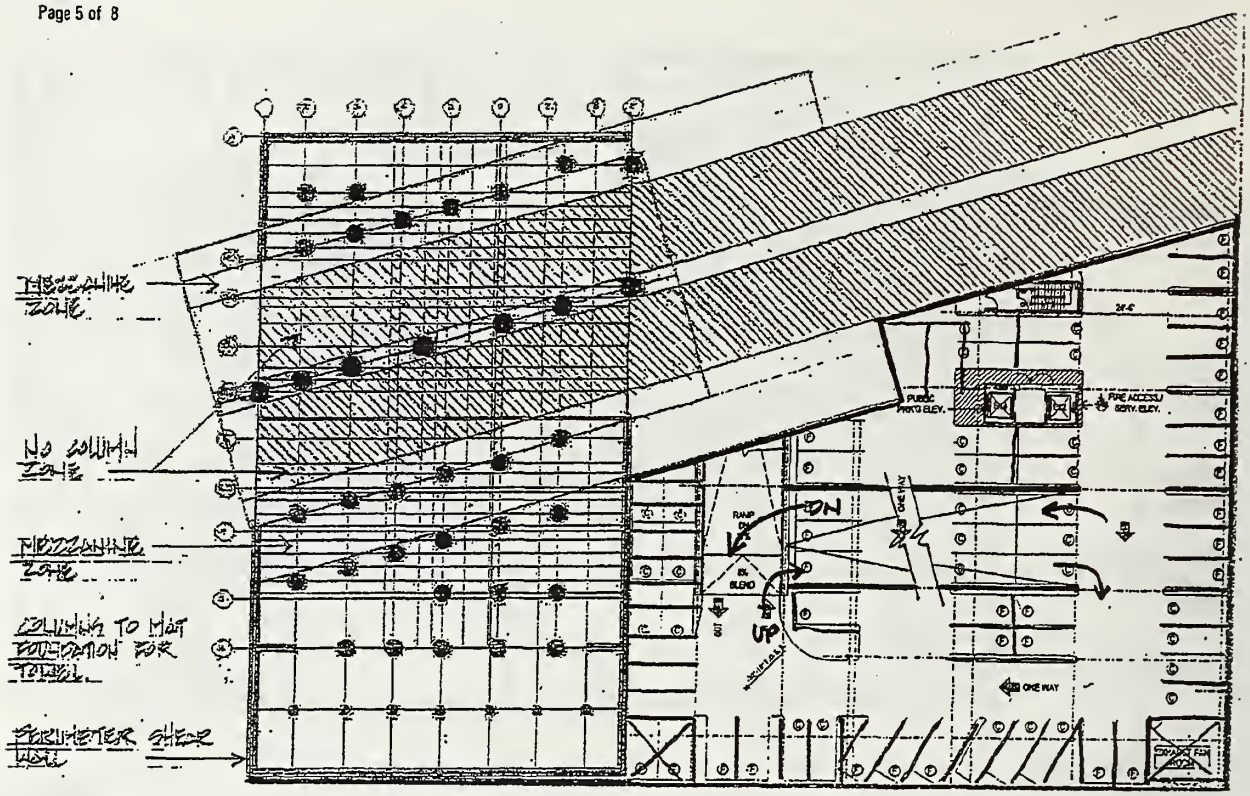


B1 Parking Level

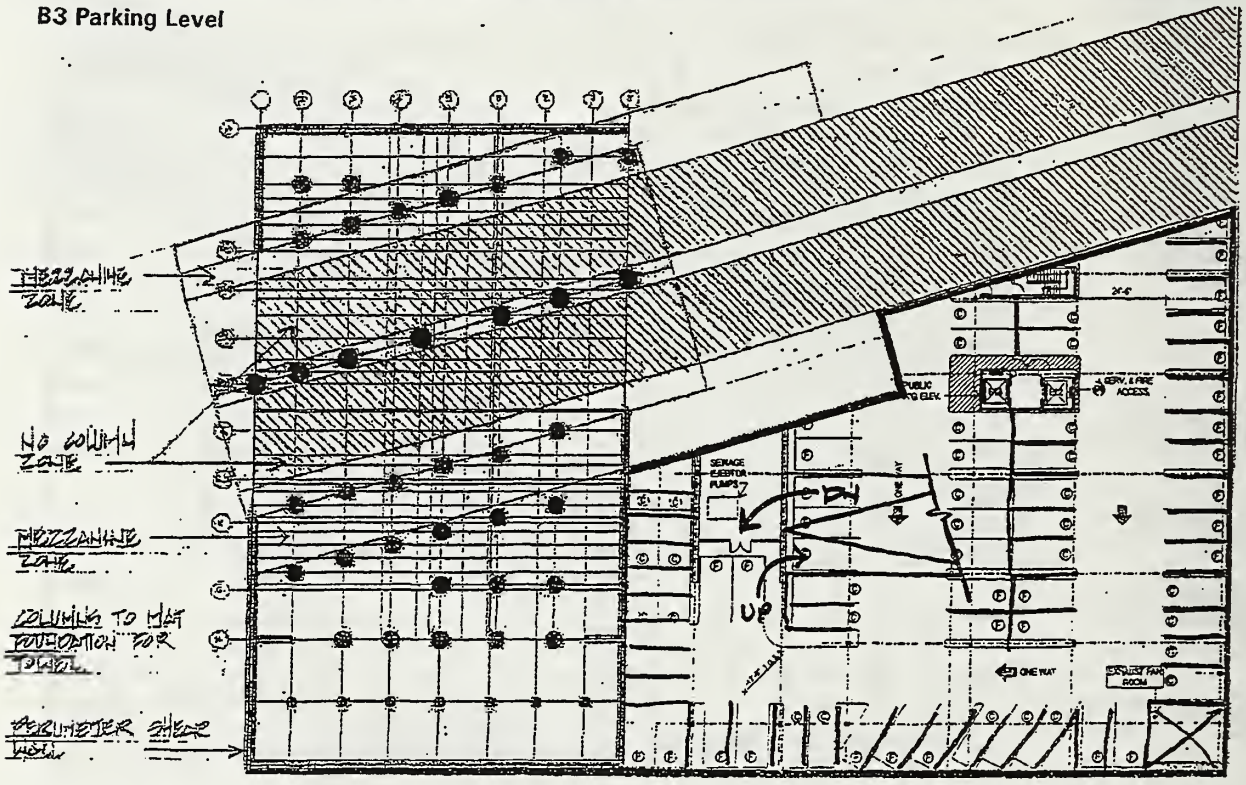


B2 Parking Level

Figure 4



B3 Parking Level



B4 Parking Level

Figure 4 continued

Relocation of Building Support Functions

For this evaluation, building support functions consist of two categories: 2- story mechanical spaces, and 1-story support spaces (utility, electrical, plumbing and storage). Caltrain's new alternative necessitates relocation of these services to tower floors above grade, and as a result valuable F.A.R. square footage will need to be recaptured else where on the site.

The 2-story mechanical spaces currently located directly beneath the residential tower footprint are strategically located to efficiently feed up into the tower. 23,725 square feet (net) of double height mechanical space would need to be relocated into the tower, for a total of 47,450 square feet. The other 1-story service areas comprise 37,262 square feet, for an overall total of 84,712 square feet of relocated space. This would absorb eight floors, equivalent to 64 units.

To address the displaced square footage from the residential tower, the area could be relocated to the office tower. This would increase the office tower 6 floors, from, 9 floors to 15 floors (Fig. 5), and increase the height of the office tower 83 feet, from 126 feet to 209 feet. Please note, the 84,714 represents net square feet associated with the support functions that would replace 8 floors of F.A.R. from the residential tower, totaling about 103,050 gross square feet, and equivalent to 6.3 current office floors, rounded here to 6 floors.

While it is possible to relocate the lost housing to the office tower, we do not recommend this given the scale of the building. The building would lose efficiency as the elevator and service core would enlarge noticeably and there would be substantial duplication of mechanical systems. Again this arrangement would be operationally challenged, inefficient and increase security concerns.

Given the steel structure above grade, sound and vibration transmittance of the mechanical equipment would be of great concern. This problem would require substantial study and result in additional costs.

Regarding aesthetics and urban design, the project's expression and connection to the street would be disrupted. With four to five lower tower floors allocated to mechanical functions, louvers would replace vision glass. The glass is an important element of the design's visual continuity and the concept of a graceful, slender glass tower. The additional 6 stories on the office tower would dramatically change the scale and daylight quality in the public atrium and outdoor space.

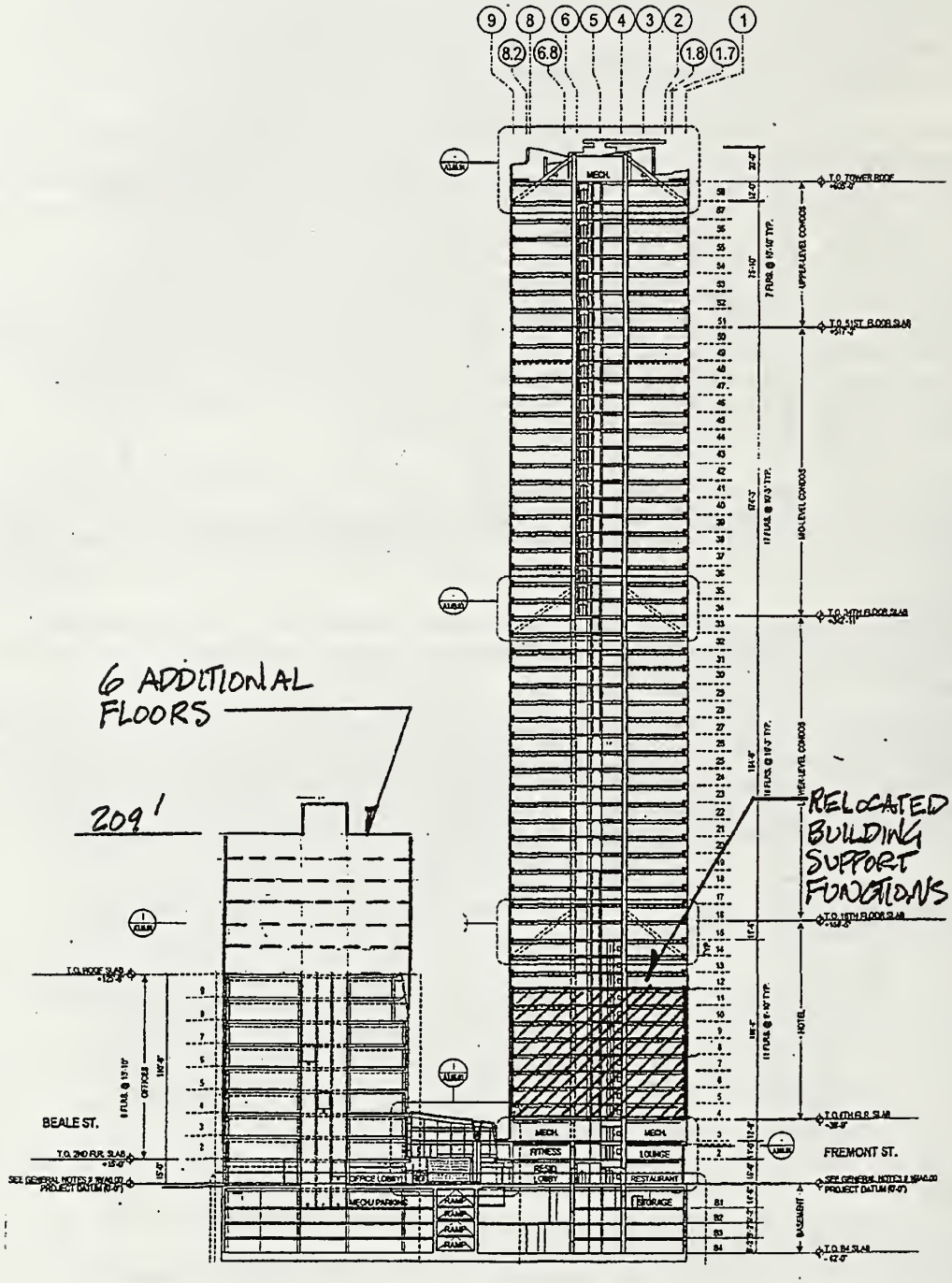

9
8
6
5
4
3
2
1
8.2
6.8
1.8
1.7
6 ADDITIONAL FLOORS
209'
RELOCATED BUILDING SUPPORT FUNCTIONS
BEALE ST.
FREMONT ST.
MECH.
FITNESS
LOUNGE
RESTAURANT
STORAGE
HOTEL
MID-LEVEL CONDOS
UPPER-LEVEL CONDOS
BASEMENT

Figure 5

Cost Issues

Given the greater complexity of the foundation system, the need to incorporate additional sound and vibration mitigation components, and the addition of 6 floors to the office tower, we anticipate the incremental construction cost will be in the range of $29,500,000 to $34,250,000. These numbers include the $15,500,000 to $20,250,000 preliminary estimate within DeSimone Consulting Engineers' letter, another $2,000,000 to mitigate sound and vibration transference, architectural and engineering design costs of approximately $2,000,000, and $10,000,000 for the additional office floors. This is above and beyond what it would have cost to do the same residential F.A.R. Alternative II analyzed in our September 19, 2002 letter would total about $35,750,000 - $43,250,000 in incremental costs as compared to the proposed project, assuming a similar approach to replacing lost developable area with office space. This total assumes the structural cost for Alternative II outlined in the December 4, 2002 DeSimone Consulting Engineers letter and an additional $4,000,000 for costs of circulation related to the "sky lobby", and would be further increased by $6,000,000 to $7,000,000 if tunnel costs are assumed. Please note these costs are very preliminary.

Caltrain Pedestrian Circulation

Since a residential tower above the Caltrains would necessitate a dense grid of columns (3 to 6-foot diameters) as they penetrate Caltrain's platforms and mezzanine beneath the project, pedestrian circulation at the platform would be circuitous and difficult to monitor for security. Making the transition upward from the mezzanine to the Transbay Terminal would also be indirect as the vertical transition would need to occur west of the 301 Mission Street Project, given the 10-foot thick tunnel roof/tower foundation projected in the DeSimone letter. As this Caltrain alternative also lowers the platform 15 feet from the prior iteration, the added vertical climb or descent, expected of the commuters could further inconvenience them creating operational concerns. These issues, together with train access issues resulting from the tunnel grade change, would need to be addressed by Caltrain.

Summary

The new Caltrain Alternative 2 significantly impacts the current design for 301 Mission Street, necessitating major revisions to the building's functional, aesthetic, urban design character, and costs. The subsequent redesign would lose 20% of its residential units, increase the amount of office space 79%, and reduce the number of parking spaces 60%. Building servicing would be less efficient. Building esthetic and urban design are compromised since mechanical relocation above grade results in louvers replacing substantial vision glass, disrupting the project's slender glass tower concept and conveying a less inviting expression to the street. The project's public atrium and open space would dramatically change in scale and daylight quality as 6 floors are added to the office tower to recapture F.A.R. Additional construction and design costs are anticipated to be in the range of $29.5 to $34.25 million. Although the Transbay space has not been designed, from the perspective of the Caltrain users, the labyrinth of large columns penetrating the pedestrian areas would likely result in circuitous pathways, a deep climb and other operational issues.

Please do not hesitate to contact us should you wish to discuss this further.

Sincerely,

Glenn G. Rescalvo, AIA
Partner
Enc: DeSimone Consulting Engineers Letter, 12/04/02

M:301Mission\docs\caltrain\atl2-120602vt

S. J. Mfg. Inc.
148 Townsend Street
San Francisco, CA 94107
415-597-7500, ext. 701

RECEIVED
DEC 06 2002
PLANNING DEPT

December 6, 2002

To Whom It May Concern,

I am submitting this letter in response to invitation for public comment on the Transbay Terminal/Caltrain Downtown Extension Redevelopment Project Draft Environmental Impact Report. I am a lease holder as well as an owner respectively, of two buildings directly involved in the report as being in the path of the Caltrain Extension. Therefore, my concerns lie primarily with the construction of the extension itself.

I would like to state foremost that I am in favor of mass transit improvements in general, and the redevelopment project specifically. I would like to add my support for the tunneling option recommended by the report, as opposed to the cut-and-cover option, which may require acquisition and demolition of property. I would like to know more about how this choice will be made and within what time frame.

Given the project goes ahead with the tunneling option, my concerns are primarily of business disruption on Townsend and Second Streets, length of construction time and vibration of building during tunneling. These issues are not thoroughly addressed in the draft EIR, nor is adequate attention given to the underpinning process as part of the tunneling process. I would like to see more information on mitigation of dust, traffic, noise and timeframe. I would like more information regarding when the various components of the project might actually begin in order to plan accordingly for the future.

Respectfully,

Seymour Jaron

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Lynn Bunim
Executive Director
External Affairs

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NOV 22 2002
PLANNING DEPT

November 19, 2002

Mr. Paul Maltzer, Environmental Review Officer
City and County of San Francisco
Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Re: Cal Train Extension Draft Environmental Impact Report (DEIR) Comments

Dear Mr. Maltzer:

Bob Pickard, SBC Pacific Bell Public Works Coordinator and I thank you for the opportunity to comment on the DEIR for your project. SBC-Pacific Bell supports your effort to improve mass transit in San Francisco. We also welcome the chance to help you in the planning stages of the project so that the project can be completed quickly, economically, and with minimal disruption.

The DEIR briefly mentions utilities, but does not portray the magnitude of the telecom facilities that both parallel and cross the proposed path of the CalTrain extension. SBC-Pacific Bell and several other telecom carriers have significant infrastructure along the route, including conduit and vaults that are as deep as 30 feet below grade. In one block, we have nearly one hundred ducts in three different structures. Several other carriers have structure on the same block, as do all the other non-telecom utilities. We will be happy to meet with your staff to provide you with specific details about our structures that we are not at liberty to make public.

We believe that by using the tunnel method of construction, the project could reduce the time, expense, and risk involved with either supporting or relocating the utilities that serve this vital portion of San Francisco

More than 30,000 SBC Pacific Bell customers suffered major service interruptions on several occasions as a result of the Bay Area Rapid Transit (BART) District's recent construction of the extension to San Francisco Airport. BART used open-cut construction methods. The risk of such a scenario in downtown San Francisco should not be acceptable to either the City or any of the telecommunications companies.

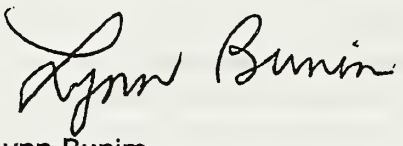
There are two other construction issues that we want to note. The water table along the route is within several feet of the surface at the route's low points, and would present a significant challenge to open-cut construction. Another factor to consider is the presence of foundation tieback cables in the street placed by recently constructed buildings. These cables are not identified on any City documents; therefore, a high risk exists that many of them might be cut during open-cut construction project. Ultimately, delays would result, as well as extra expense.

Like other major downtown employers with thousands of employees working in five major buildings and three field work centers near the proposed construction path, we are also concerned about the disruption, noise, environmental impacts, access restrictions, and quality of work-life issues that open-cut construction would present. Once again, using tunnel construction would avoid these issues for all downtown business workers.

While we welcome the improvements for public transit and the upgrades to the neighborhood and terminal that your project offers. We simply ask that you utilize the least disruptive methods of construction, namely tunnel construction so that our infrastructure and our service to downtown customers can remain intact

If you have any questions regarding this matter, or need specific information about our underground facilities, please contact Bob Pickard, our Public Works Coordinator, on (415) 542-9095.

Sincerely,



Lynn Bunim
Executive Director
SBC Pacific Bell

rwp/

cc: Supervisor Chris Daly, City and County of San Francisco
Laurie Miller, General Manager, SBC North Bay Construction and Engineering

VIII. Individuals

TITAN MANAGEMENT GROUP
Professional Property Management Services

Joan Kugler
Environmental Analyst
City & County of San Francisco
1660 Mission St. #500
San Francisco, CA 94103

December 12, 2002

Dear Ms. Kugler.

These comments are submitted on the Transbay Terminal/ Caltrain Downtown Extension/ Redevelopment Project DEIS, DEIR and Draft Section 4(f) Evaluation (the "Environmental Document") on behalf of the Clocktower Lofts Owners Association.

- The Clocktower is an historic building in a historic area.
- The Clocktower is a live/work building providing housing for 127 families including small children.
- The Clocktower is already an area in city with mitigations for the Giants Stadium. Second Street is designated as a pedestrian walkway; Third and Fourth Streets are the bus bridges.
- This area is already subject to extensive disruption during Cal Trans bridge and approach demolition and rebuilding for next 5 years.
- The Clocktower relies on open windows for ventilation as do many of its Stillman Street neighbors.

Bus Storage Facilities

One of the project elements is development of bus storage facilities. 42 or 53 AC Transit Buses would be stored between Second and Third Streets at Stillman, facing our building. 140 Golden Gate Transit buses would be stored between Third and Fourth.

These bus yards would concentrate noise and diesel emissions in a semi-enclosed area near high density residences and businesses.

The Environmental Document is obligated to consider the environmental impacts of the project, including all its components. The Environmental Document does contain a discussion of air quality impacts. It appropriately includes a microscale air quality assessment. The microscale analysis, however, was limited to an assessment of the concentrations of carbon monoxide.

The California Air Resources Board has identified diesel emissions as a carcinogen. In recognition of the health risks to children from diesel exhaust, the ARB has just taken action to prohibit idling of school buses within 100 feet of a school building, see http://www.arb.ca.gov/newsrel/nr121202.htm.

The buses utilizing the storage facilities contemplated by this project will undoubtedly be a source of diesel emissions. These emissions could be a significant health risk because of the number of buses involved. The Environmental Document acknowledges that bus engines will be warmed up in these storage areas (page 5-63). The emissions in these storage areas will be more concentrated than they would be in an open area because of the semi-enclosed covering of the freeway structure. In addition to presenting possible health hazards to residents in the surrounding areas, the relative enclosed nature and lack of significant airflow in this area may present substantial health hazards to the bus drivers and associated mass transit employees.

There are numerous residences located in this area that house sensitive populations, including children. There is a residence for the elderly adjacent to this area.

An analysis of the environmental impacts of this project should include an identification of the residences near the bus storage facility, the sensitive populations that would be affected, and an analysis of the potential exposures to diesel exhaust, including a worst case analysis and a cumulative impact analysis.

Diesel engines are also notorious sources of noise. The noise will also be greater because it will be partially contained by the freeway structure. The Environmental Document contains only a four line qualitative discussion of the bus storage facility noise impacts (page 5-63). There is no quantitative analysis presented.

The Environmental Document proposes construction of a sound wall on the south side of the storage areas to mitigate the noise impacts. This appears to be based on a recognition that the noise impacts would be regarded as significant though that is not explicitly stated. There is no analysis of how effective the sound wall would be. A sound wall may not be effective since it would be expected that noise would reflect off the bottom of the freeway structure and escape over the top of a sound wall. A sound wall on the south side of the storage areas will not mitigate the noise impacts on the Clocktower at all.

There are accepted methodologies for conducting a quantitative noise analysis of the operation of these storage facilities. Such an analysis should be performed and presented. If there are significant impacts, they should be acknowledged and mitigated. There should also be an analysis of the effectiveness of any proposed mitigation measures.

Vibration Impacts

The Environmental Document states that "the highest levels of ambient ground-borne vibration were measured at the Clock Tower (sic) building at Bryant and Second Streets. Both exterior and interior vibration was measured. The exterior location was on the sidewalk relatively close to the street. Even at this location, the highest vibration levels were only slightly above what can be perceived by most humans." (Page 4-32)

The vibration analysis that was performed showed that vibrations would exceed the FTA impact threshold for residential land uses in the hallway of the Clocktower even with mitigation in the form of a resilient track system. The vibration analysis included projections for 4 additional locations in the Clocktower. Those projections show that vibrations would be very close to exceeding the impact threshold.

The Environmental Document, however, concludes with respect to the Clocktower: "Projected vibration levels exceed the impact threshold only at the hallway site, and therefore no mitigation is indicated." In itself, this is a questionable conclusion since the hallway itself is part of the residential use.

Moreover, vibrations are already a significant problem at the Clocktower. This is apparently because of the building's proximity to the elevated freeway structure. We are very concerned about any vibrations in addition to the ones already experienced. An analysis of the impacts of the project on the Clocktower must include an analysis of the impacts of the project in addition to the impacts already experienced. The explanation of the vibration analysis does not indicate that this has been done.

The Environmental Document also indicates that there are some significant qualifications on the vibration analysis.

In light of the qualifications on the vibration analysis and in light of the results showing that the impact threshold has been exceeded in the hallway and showing that impacts elsewhere are close to the impact threshold, the analysis that has been done should be regarded as a screening level analysis. The results indicate that a more specific and detailed analysis should be performed. Any analysis should include indicate the vibrations that would be experienced if vibrations from the train occurred at the same time as serious vibrations from the freeway.

The Clocktower believes this analysis is legally required. Additionally, if this analysis is not performed and if there is damage to the Clocktower residents or to the building from vibrations, a failure to have performed this analysis could have profound legal consequences.

Construction Period Access

The Environmental Document states that if the cut and cover method of tunnel construction is utilized, there will be block-by-block closures on Second Street. A chart describing the driveways and streets temporarily blocked by construction mistakenly states that only a delivery entrance at the Clocktower would be blocked. Obviously, the Clocktower has not been provided with the detailed plans for the closure of the Second Street, but it would appear that a driveway entrance would be blocked as well. This driveway provides access to parking both in an exterior lot and in an underground interior lot. This driveway also provides emergency access/egress in the event of a fire or other emergency.

The Environmental Document should correctly assess the impacts on the Clocktower. If the street closure will prevent access to parking, even temporarily, that impact must be fully mitigated.

Construction Period Noise and Vibration

The Environmental Document presents a qualitative analysis of the noise impacts, and apparently concludes that the construction phase noise impacts would be significant. The mitigation measures that are proposed, however, are so vague and ambiguous as to be unenforceable. They include such things as "conduct noise monitoring," "conduct inspections and noise testing of equipment," "implement an active community liaison program." Specific quantitative noise limits should be stated for each period during the day. .

The Environmental Document states that noise waivers may be obtained to allow nighttime construction. It also states that "it is not anticipated that the construction documents would have specific limits on nighttime construction. (page 5-185)." There will apparently be no limits on the use of jack hammers, hoe-rams and pile drivers before 10 p.m. This will significantly add to the nose in the area. Mitigation measures could easily be developed preventing the use of such extremely noisy equipment unless a specified standard of necessity were met.

A meaningful noise mitigation program could do much better than this. It could set forth specific showings that must be made in order to justify nighttime construction. The proposed mitigation measures contain none. It could set forth noise limits in the event nighttime construction is necessary. The proposed mitigation measures do not. It could prohibit the use of certain equipment at night. The proposed measures do not.

The mitigation plans states that contractors will be required to "use equipment with effective mufflers." What is an "effective" muffler? This is so vague as to be meaningless. Additionally, there is often an electric alternative to diesel-powered equipment. There is no requirement to use electrically powered equipment when it is available.

The Environmental Document acknowledges that construction vibration effects can damage historic buildings. It states that a study has been done showing that no damage will occur due to construction vibrations. This study is not presented, and so it is impossible to evaluate.

Additional Comments

All in all, the noise, disruption, and other impacts of the cut and cover tunnel construction alternative are so severe that it should be abandoned as a project alternative.

The Clocktower has entered into an agreement with Caltrans to lease the parking lot off Harrison Street behind Marathon Plaza. This lease will run from the completion of the Western Approach Seismic Repair until December 31, 2038. The Environmental Document should analyze whether any of the ramp alternatives would have an impact on this lot and mitigate any impacts that may occur.

The Clocktower has entered into an agreement with Caltrans to use the parking lot at Second and Harrison until completion of the Western Approach Seismic Repair. This lot is identified for future redevelopment. The timing of that redevelopment is not stated. No potential development of that site should interfere with the Clocktower's ability to use that lot in accordance with its agreement with Caltrans.

Figure 4.1-1(b) setting forth Existing Land Uses erroneously fails to identify the parking lot at Second and Harrison or the parking lot beneath the existing Harrison Street off-ramp. That figure also identifies the Clocktower as residential, whereas it is a live/work building.

Chapter 4.18 fails to identify the tower containing the clock on the Clocktower Building as a visual resource or as part of the visual character of the area. The Clocktower is one of the most significant and well-recognized landmarks in the area.

We have also stated our concerns at the Public Hearing April, 2001, and in writing, requesting a study of the Effects of Emissions the many residences and businesses. .Those comments are all incorporated by reference in these comments.

We are concerned that public health and safety needs are not being met, and we are considering legal action. We feel we have been ignored in the process. The Clocktower Lofts Owners Association is not even on the distribution list for information. Please correct that omission.

Yours very truly,

Michael Alfaro
Vice President
Titan Management Group

cc Planning Commission

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DEC 26 2002
PLANNING DEPT

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Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Ste. 500
San Francisco, CA 94103

December 20, 2002

Re: Caltrain - Transbay Terminal DEIR Comments

In 1992 I circulated the first version of my plan for extending Caltrain to a re-built Transbay Transit Terminal (TTT). The result of over five years of research and design, it suggested that a tunnel could be dug under Rincon Hill to bring trains from Mission Bay to the Transbay Terminal. Over the next decade, I refined the design to meet the changing technical and political situation. My comments come from my decade-plus involvement with the project.

The bus and terminal building project, described in the DEIR, is an excellent design. This portion of the project was often the most contentious, as initially the City of San Francisco proposed removal of the bus facility. The current design can be further improved by shifting the footprint of the facility to the west, to occupy the area of the failed residential highrise project to the immediate west of the TTT. This would allow the above-ground portion of the TTT to keep to the west of Beale Street, removing the need to bridge that street.

The bus storage facility is crucial to the operation of the terminal. The location proposed for bus storage, beneath the west approach to the Bay Bridge, between Fourth and Second Streets, connected to the terminal by grade-separated ramps, is the best alternative available. The storage facility will be an improvement over the unimproved parking lots that currently occupy the land under the freeway. Proper landscaping and design will make an aesthetic improvement to the neighborhood. The maintenance and security of the facility will improve the safety of the neighborhood. The continuing evolution of bus propulsion technology, the switch to cleaner fuels, will result in fewer pollutants in the neighborhood, not more.

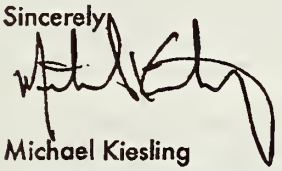
The terminal capacity and operations described in the DEIR meet all the objectives that I worked for over the past years. I support the West Ramp Alternative as the preferred alternative.

Redevelopment is key to this project, from both a urban design and funding perspective. I support the Full Build Alternative, and would like to see it expanded to other properties in the immediate terminal area that have not yet been redeveloped, and any properties north of Harrison Street that might be needed for construction of the Caltrain extension. It would also help the neighborhood if the need for the diagonal exit ramp leading to the intersection of Fremont and Folsom Streets could be re-assessed, as it reduces the development potential for the area by splitting a large lot and creating a dangerous 5-leg intersection.

Finally, provision for an extension of Essex Street should be made beneath the highway ramp as far as First Street. By providing a second approach to the bridge from First, traffic on upper First Street, past Folsom, can possibly be limited to carpools, removing the queued afternoon traffic out of the redeveloping residential neighborhood.

Good luck with the project. I look forward to reading how you plan to incorporate these suggestions into the final EIR, and seeing them implemented in the construction of the project.

Sincerely,



Michael Kiesling

A pdf of this letter and all drawings is available at:

www.arch21.org/tttdeir.pdf

or as html at:

www.arch21.org/TTTDEIR.htm

The remainder of my comments concern the Caltrain component of the project. This portion of the project needs much greater refinement, as part of it is currently un-workable as designed.

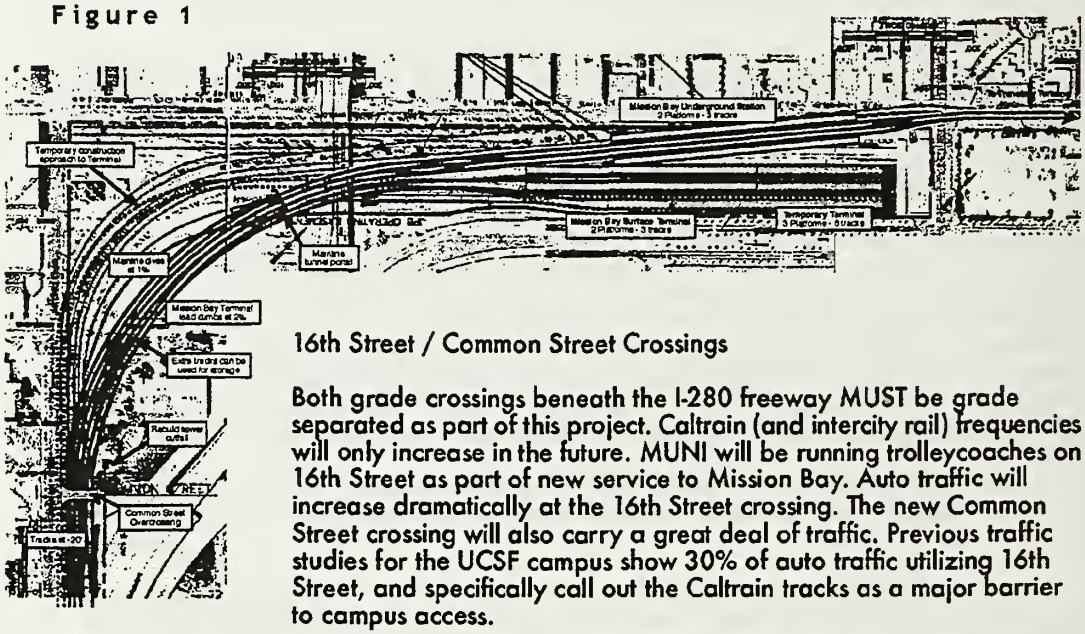
I STRONGLY support the Fully Tunneled Option under any alignment. This project cannot rip down blocks of buildings in the South Beach/Rincon Hill neighborhood. I also suggest that the alignment be "fine-tuned" to minimize the impact of construction on existing buildings. In the attached Figures 2 and 3, I've outlined a new alignment about 150' to the west of Second Street that has a smaller impact on the built environment.

The following comments are made geographically, starting south of the project area and working towards the TTT.

Fill Disposal & Storage/Light Maintenance Area

This project will generate a great deal of fill with no identified location to dispose of it. The Caltrain ROW between Palou and Cesar Chavez Streets runs along a 20' embankment. This embankment can be enlarged with suitable spoils from the tunneling and excavation of the rail extension and terminal project to create space for storage tracks and a minor maintenance facility. This can replace the function of the yard near the current Fourth and King terminal, and allow for fill disposal very close in to the project area, greatly reducing hauling costs.

Figure 1



16th Street / Common Street Crossings

Both grade crossings beneath the I-280 freeway MUST be grade separated as part of this project. Caltrain (and intercity rail) frequencies will only increase in the future. MUNI will be running trolleycoaches on 16th Street as part of new service to Mission Bay. Auto traffic will increase dramatically at the 16th Street crossing. The new Common Street crossing will also carry a great deal of traffic. Previous traffic studies for the UCSF campus show 30% of auto traffic utilizing 16th Street, and specifically call out the Caltrain tracks as a major barrier to campus access.

By beginning to descend into an open cut soon after crossing under Mariposa Street, both 16th and Common Streets can be grade separated. The height of the I-280 viaduct is great enough so that the cross streets can be raised some to help with the separation. Additionally, there is

enough distance to allow the yard lead for the permanent Mission Bay surface station to climb back to the surface after passing under Common Street. The Mission Creek outfall will need to be rebuilt, but this is not a fatal flaw to the grade separation. These issues are illustrated in the attached Figure 1.

Seventh Street Curve

Existing and future rail operations will be greatly improved by increasing the radius (and thereby the design speed) of the Seventh Street curve. Today, with the terminal at Fourth Street, there is little operational advantage to increasing the speed of the curve. But, under future conditions, many trains, especially intercity and express trains, will not be stopping in the Mission Bay area. Leaving the Seventh Street curve as a major speed constraint will degrade the operations of the mainline.

An equitable solution should be easy to reach with Catellus (the owner of the property at Mission Bay) to move the PCJBC operating easement to allow for the improvement of the curve. (See Figure 1) The property on the inside of the curve, which would be impacted by re-alignment of the curve, is hemmed in by the existing (and future tracks), the Sixth Street off-ramp from I-280, and the Mission Creek pumping plant. Moving the tracks to reduce the area of this parcel INCREASES the area of the outer parcel, which fronts on Townsend and Seventh Street, facing the edge of the Showplace Square neighborhood.

Temporary Terminal During Construction

Obviously, Caltrain will require to continue operation into San Francisco while the extension is under construction. Utilization of roughly one-half (6 tracks) of the existing terminal should provide sufficient capacity for daily operations. Figure 1 shows a suggested arrangement of the temporary and permanent facilities in the Mission Bay area.

The first phase of construction would reconfigure the south 6 tracks of the existing station and construct a small portion of the sub-surface mainline in the area that the temporary lead tracks for the terminal will cross the mainline, approximately under the Sixth Street overcrossing. A temporary shoo-fly would also be constructed from Mariposa Street to King Street west of the existing tracks, in the ROW of Seventh Street. Seventh Street is wide enough to accommodate two tracks plus two traffic lanes.

Once the first phase is complete, trains would run on the shoo-fly from Mariposa Street into the Seventh Street ROW, curve towards the terminal at King Street, passing over the new mainline at about Sixth Street, and then into the southern six tracks at the existing terminal. Excavation and construction of the sub-surface Mission Bay station and depressed mainline from Mariposa Street north would commence, including construction of the 16th and Common Street overcrossings. A permanent lead to the surface station at Mission Bay would also be built to the south of the mainline.

Once the downtown extension is operational, the 6-track surface terminal would be reduced to a 3-track, 2 platform terminal. I am suggesting that it be set back from both Fourth and King Streets, to allow development of the property on the street frontage to improve the activity in the neighborhood. This shields the trains from the surrounding development, mitigating the concerns over leaving a surface rail operation in the area.

Mission Bay Sub-Surface Station

The sub-surface Mission Bay station should be constructed with at least three tracks, allowing trains to pass through with trains stopped at each platform. The station should also be deep enough to allow a mezzanine at the east end of the station so the platforms don't have to connect directly with the street. This station will still see heavy ridership after the extension opens, and a good pedestrian flow is crucial to the operation of the station.

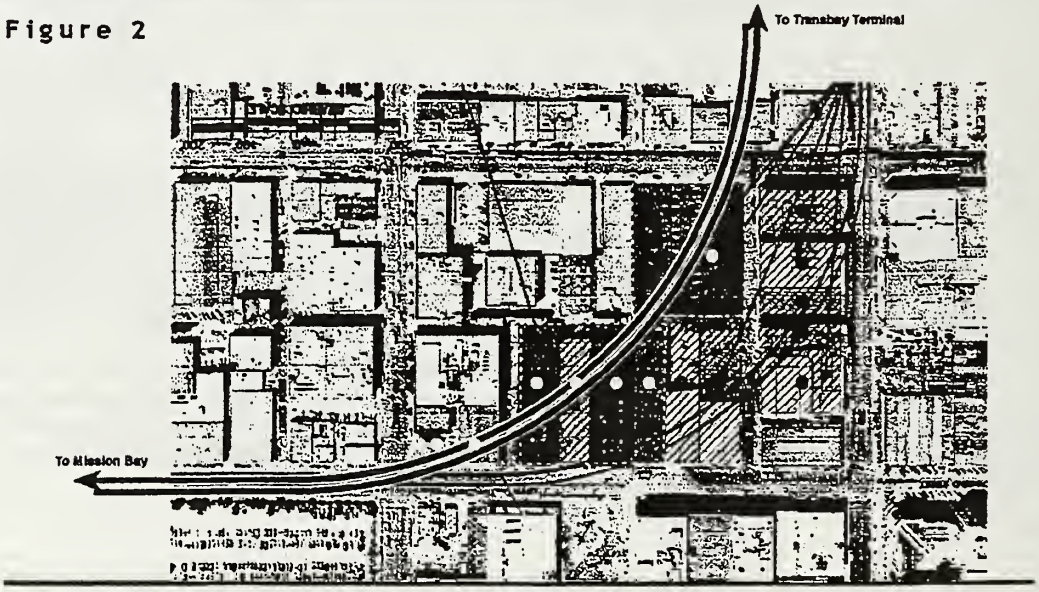
West of Second Street Alignment

Key to the entire Caltrain extension project is the minimization of construction disruption to the neighborhoods it will be passing under. In my 1992 proposal, I pointed out that the alignment passed under Rincon Hill, and therefore could be tunneled under the hill. Digging a cut and cover tunnel along Second Street not only requires acquisition of many historic and expensive properties, many recently renovated, but also the excavation and shoring of a 100' deep trench for four blocks along Second Street. A bored tunnel is the only realistic way to build the extension.

For the past decade, I've refined my designs for the project, altering the alignment in many ways. In the recent years, as the specific requirements for high speed rail have become clear, forcing the alignment from Essex Street to Second Street, I've identified a new alignment west of Second Street that should further reduce impacts on developed properties and improve the alignment into the terminal to allow for the maximum platform length.

Starting in the Mission Bay area, shown on Figure 2, the alignment begins to turn to the north just west of Third Street. It passes directly beneath the first two buildings on the north side of Townsend Street, then the public ROW of Clarance Place, and then beneath the mid- to rear-portions of 166-168, 162-164, 148-154, and a very small portion of the rear of 144-146 Townsend Street. The ground-level above this alignment is slightly higher throughout, resulting in a deeper tunnel, further minimizing potential impacts on the structures at ground level.

Figure 2

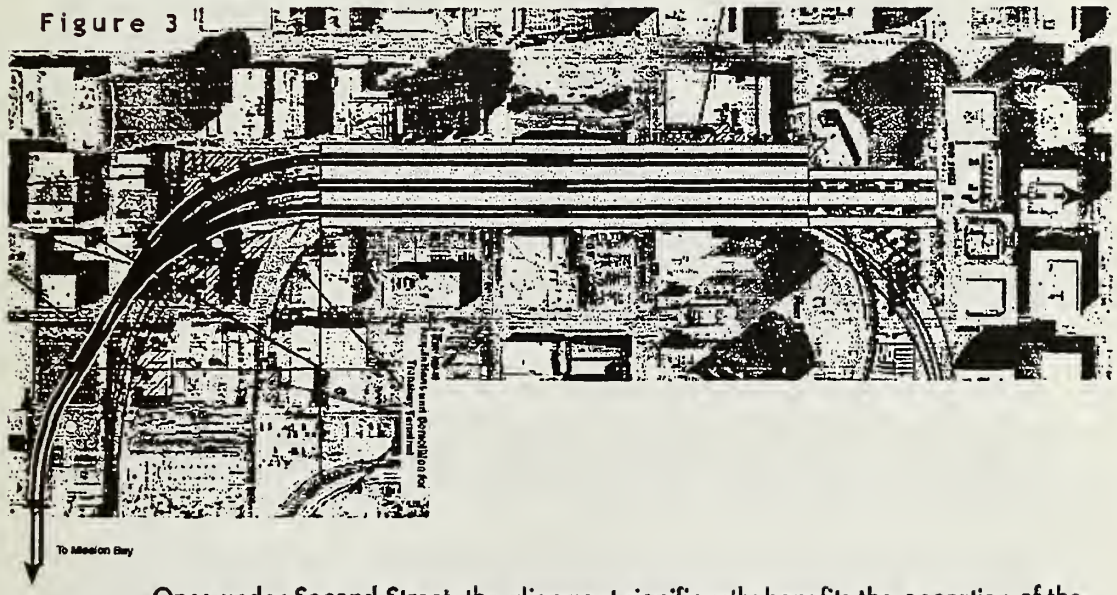


Once under the historic buildings along Townsend Street, the tunnel runs beneath a large surface parking facility, utilized by Pacific Bell. If necessary, this large property could be utilized for the tunnel heading, allowing tunneling to proceed in two directions, north to the terminal, and south towards the Mission Bay station. The current use of the property, parking and one-story garage, can easily and inexpensively be relocated to a nearby parcel during construction. Access to the tunnel heading on Brannan Street keeps large haul trucks out of the more congested streets near Mission Bay and the ballpark. (Please note- In the DEIR drawings, Brannan is mis-spelled as Brennan.)

North of Brannan Street, the tunnel is running deep under the South Park neighborhood. Where it passes beneath the Bay Bridge approach, the opportunity exists for integrating any necessary emergency access and ventilation facilities within the bus storage facility. Between Harrison and Folsom Street, most of the tunnel is under empty properties. From Folsom Street to the intersection of Howard and Second Streets, the alignment is threaded between highrises, ending beneath a large parking lot at the intersection. Almost 60% of this "off-street" alignment is under empty lots or streets, and many of these properties are in public ownership as streets or parks.

This alignment eliminates the need to acquire and demolish at least 3 properties along Second Street, 201, 205-15, and 217 Second Street. Additionally, since the angle of the tracks in the throat change, it should be possible to avoid 580-586 Howard Street. Three of these are significant historic buildings. This is shown in Figure 3.

Figure 3

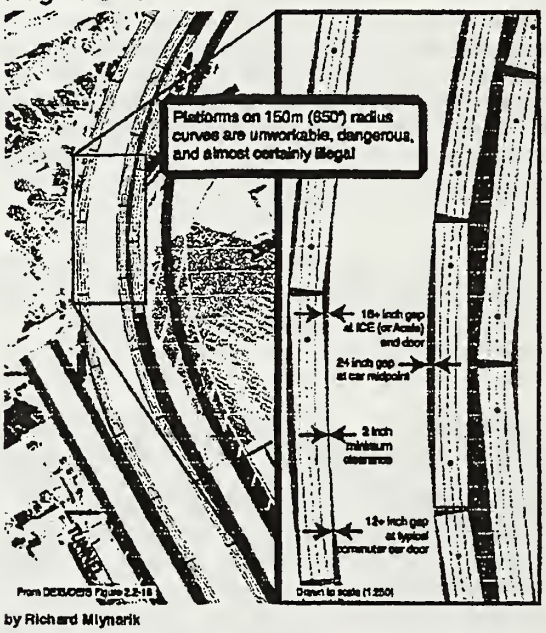


Once under Second Street, the alignment significantly benefits the operation of the terminal, in either the Second to Main or Second to Mission alternatives. The design allows the throat of the station to begin sooner, allowing longer platforms. Richard Mlynarik has provided comments showing a Second to Mission alignment. I will describe the simpler Second to Main (Terminal Basement Platforms) alignment in this document.

Terminal Basement Platforms

The proposed high-speed rail platforms described in the Second to Main alternative in the DEIR are completely un-workable, due to the gap between the curved platform and standard high-speed rail cars. See Figure 4. This should drop this terminal configuration from consideration, due to its inability to accommodate standard high speed rail train consists, or even standard commuter trains.

Figure 4



by Richard Mlynarik

I do not support the inclusion of tailtracks as part of this project. With platforms well over 1000' possible in the basement of the rebuilt TTT, and the provision for four of the platforms to extend to 1,450' with minimal effort, crossovers can be added at the midpoint of each pair of platform tracks to allow a pair of Caltrain consists to independently access each platform. The tailtrack is pulled into the body of the station.

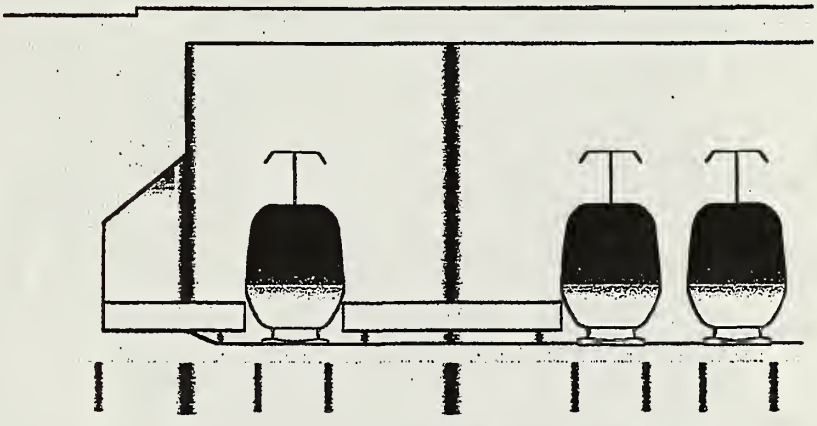
Recent MTC studies have placed the cost of a new Transbay rail tube between $2.75 and $7.25 billion. Preliminary estimates from the High Speed Rail Authority peg the cost of constructing a new high-speed line from the South Bay to Oakland at about $2 billion. It seems clear that Oakland (and the entire East Bay) would be better served with their own line, rather than an expensive transbay connection to the San Francisco line. If it does become necessary to invest in a new transbay rail link, the added cost to tunnel through the pilings of the buildings between Main Street and the Embarcadero will add very little to the overall cost of a multi-billion dollar project.

Additional transbay commute capacity can be achieved through expansion of the transbay bus service, an integral part of this project, and the growth of the ferry network. AC Transbay service today is a fraction of what it was in the 1970's, so simple expansion to previous levels can add significant capacity. Finally, the expansion of the regional ferry system will take place mainly in the Bay Bridge corridor.

For all of the reasons cited above, the platform configuration shown in Figure 3 should be substituted for the current Second-Main Alternative. The design allows for 1,150' platforms in alignment with the terminal, extending to Beale Street. The four tracks on the south side of the terminal can be extended another 300' (for a total of 1,450' - today's European High Speed practice) with minor modifications to the rear extension of the Pacific Gateway building on Mission, between Beale and Main Streets.

Another alteration to the proposed platform design is to change the arrangement of tracks and platforms from 3 platforms / 6 tracks, to 4 platforms / 6 tracks. This allows crossovers to be placed on all track pairs to allow 2 500' train consists to share the same platform. This increases capacity in the station and replaces the function of the discarded tailtracks. The side platforms, serving only one track each, would be narrower, and could be excavated alongside the station box, to limit the total amount of excavation. See Figure 5.

Figure 5



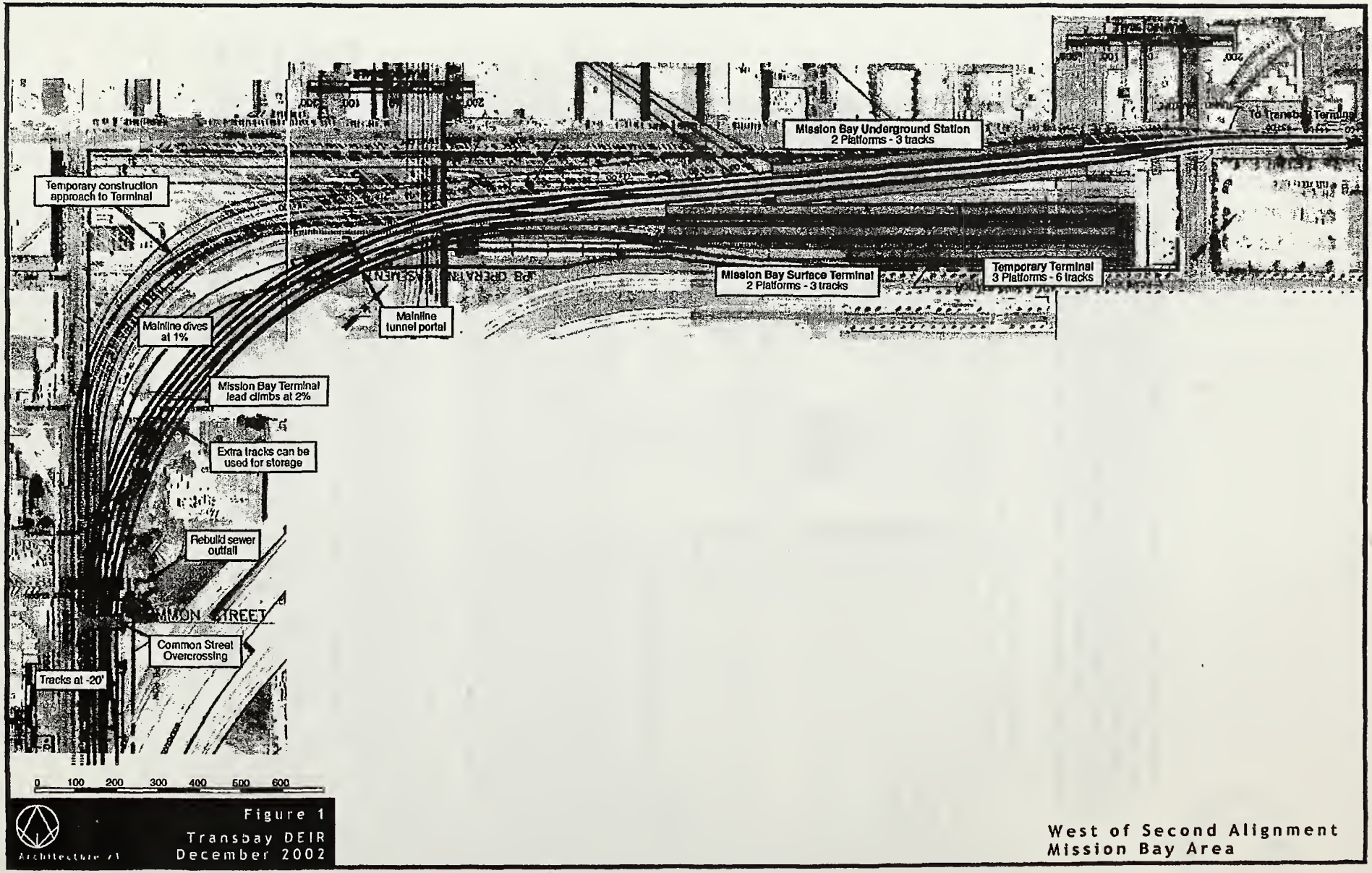
Section through terminal showing side platform

Connection to Market Street

I do not support an underground connection to Market Street, although I do urge surface improvements to both sidewalks along Beale, Fremont and First Streets, and installation of a mid-block pedestrian signal at the intersection of Ecker and Mission Street. Ecker Street has been improved as a pedestrian way between Mission and Market Streets, leading to the Montgomery Street (MUNI/BART) station. The intersections of Stevenson and Jessie with Ecker should also be modified to raise the Ecker crossing to slow traffic on Stevenson and Jessie. As a further improvement, the possibility of adding an entrance to the Montgomery Street station near Ecker on Market Street should be assessed.

Urban Design Suggestions

As the project progresses in design, there are a few items that should be explored. The unbuilt phase of the Foundry Square project immediately south of the TTT on Howard Street, between First and Fremont, should be integrated into the TTT with mid-block pedestrian access through their building from their planned open space at the corner of the project. The proposed project to the north of the terminal at 301 Mission (between Fremont and Beale) should also be integrated with the project, providing pedestrian access to the mezzanine levels of the terminal. Additionally, auto and truck access to the underground parking should be developed jointly with the TTT development so that only one delivery/parking access point is need for the combined projects. This is key, as MUNI will be running many routes on Beale and Fremont Streets to access their new terminal beneath the TTT. Extra driveways will cause conflicts with the MUNI, other transit, and autos around the terminal.


Mission Bay Underground Station
2 Platforms - 3 tracks
To Transbay Terminal
Temporary construction approach to Terminal
Mainline tunnel portal
Mission Bay Surface Terminal
2 Platforms - 3 tracks
Temporary Terminal
3 Platforms - 6 tracks
Mainline dives at 1%
Mission Bay Terminal lead climbs at 2%
Extra tracks can be used for storage
Rebuild sewer outfall
Common Street Overcrossing
Tracks at -20'
0 100 200 300 400 500 600
Figure 1
Transbay DEIR
December 2002
West of Second Alignment
Mission Bay Area

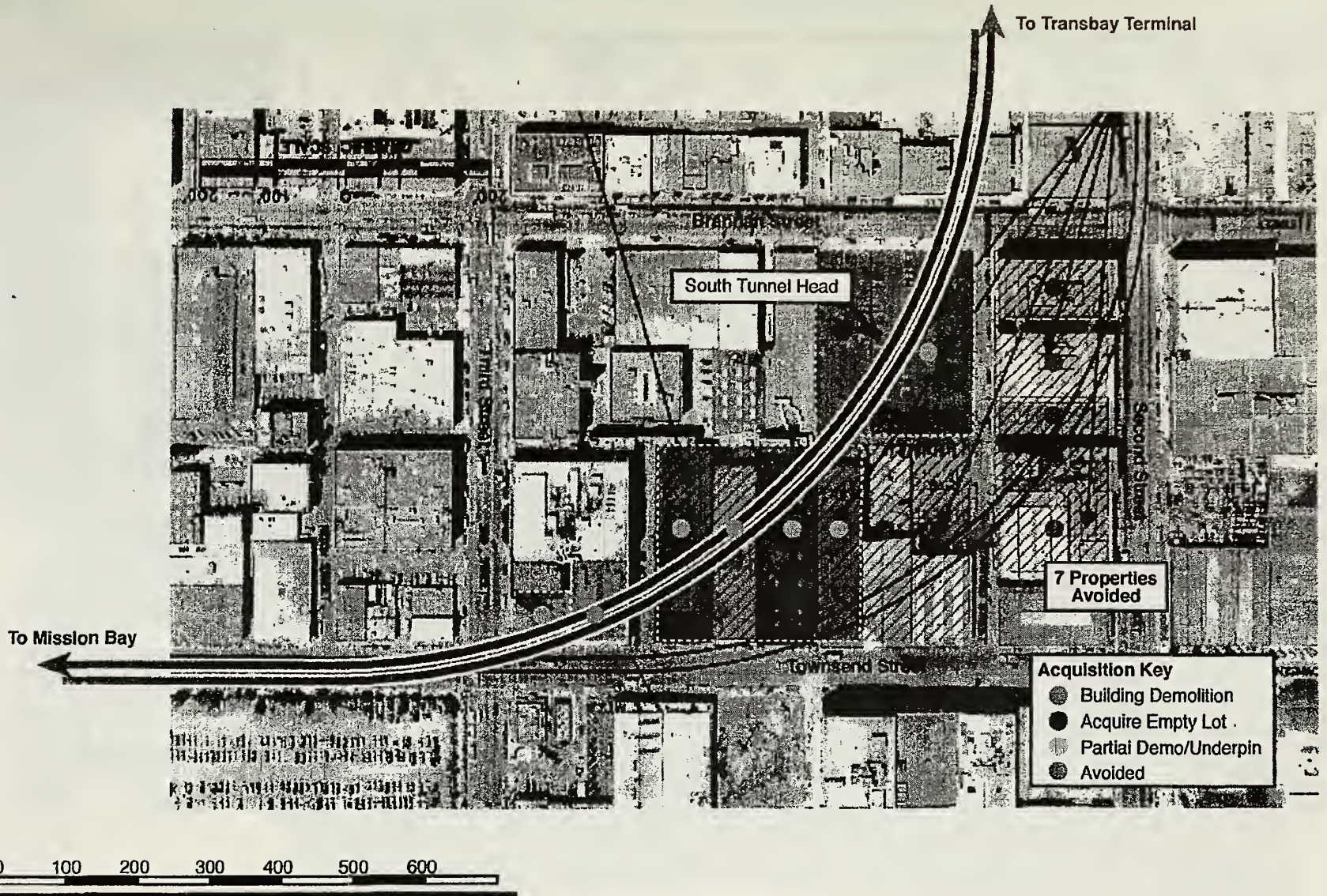


Figure 2

Transbay DEIR
December 2002

Architecture 21

West of Second Alignment
South Portal Tunneled Section

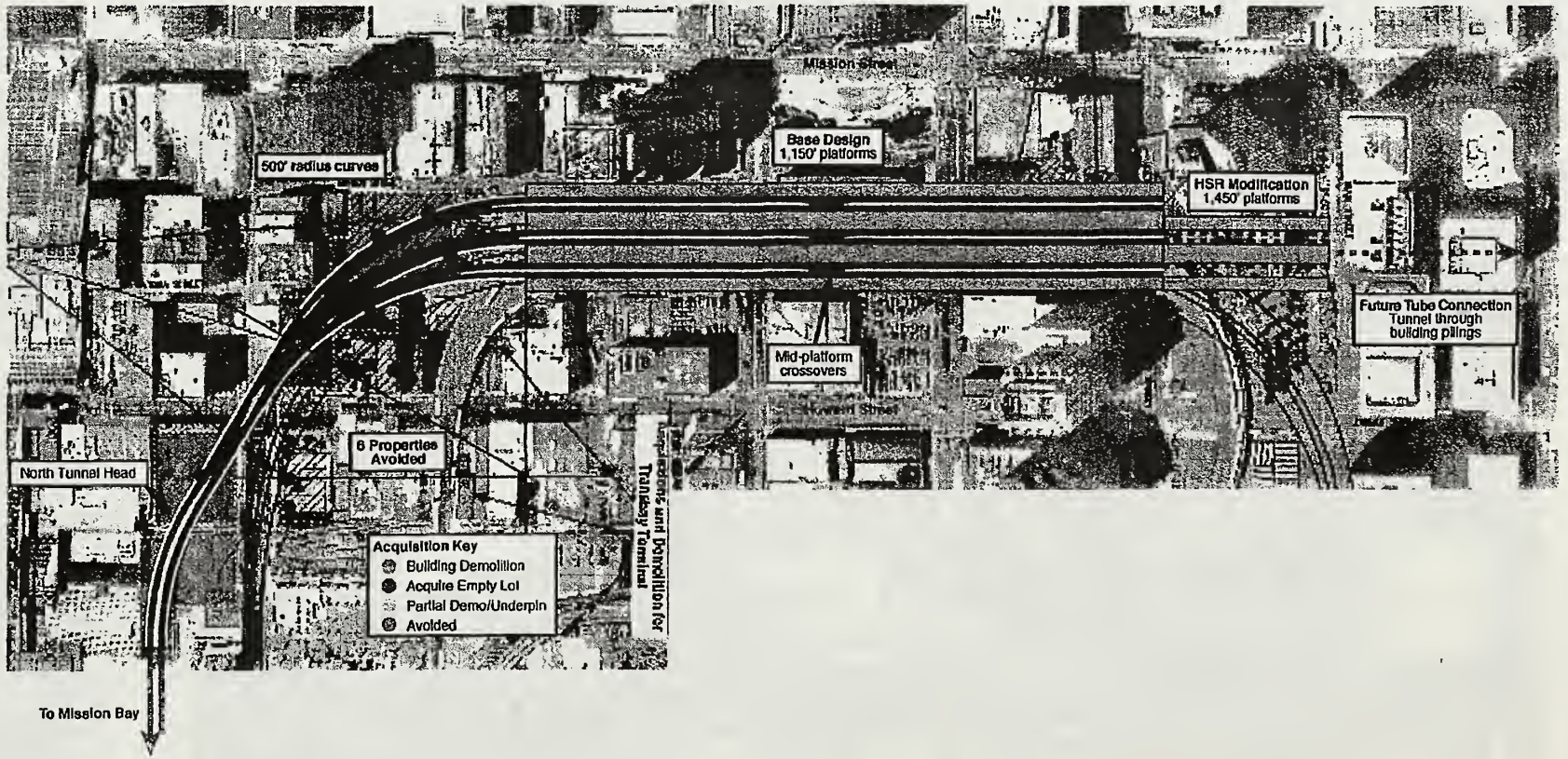
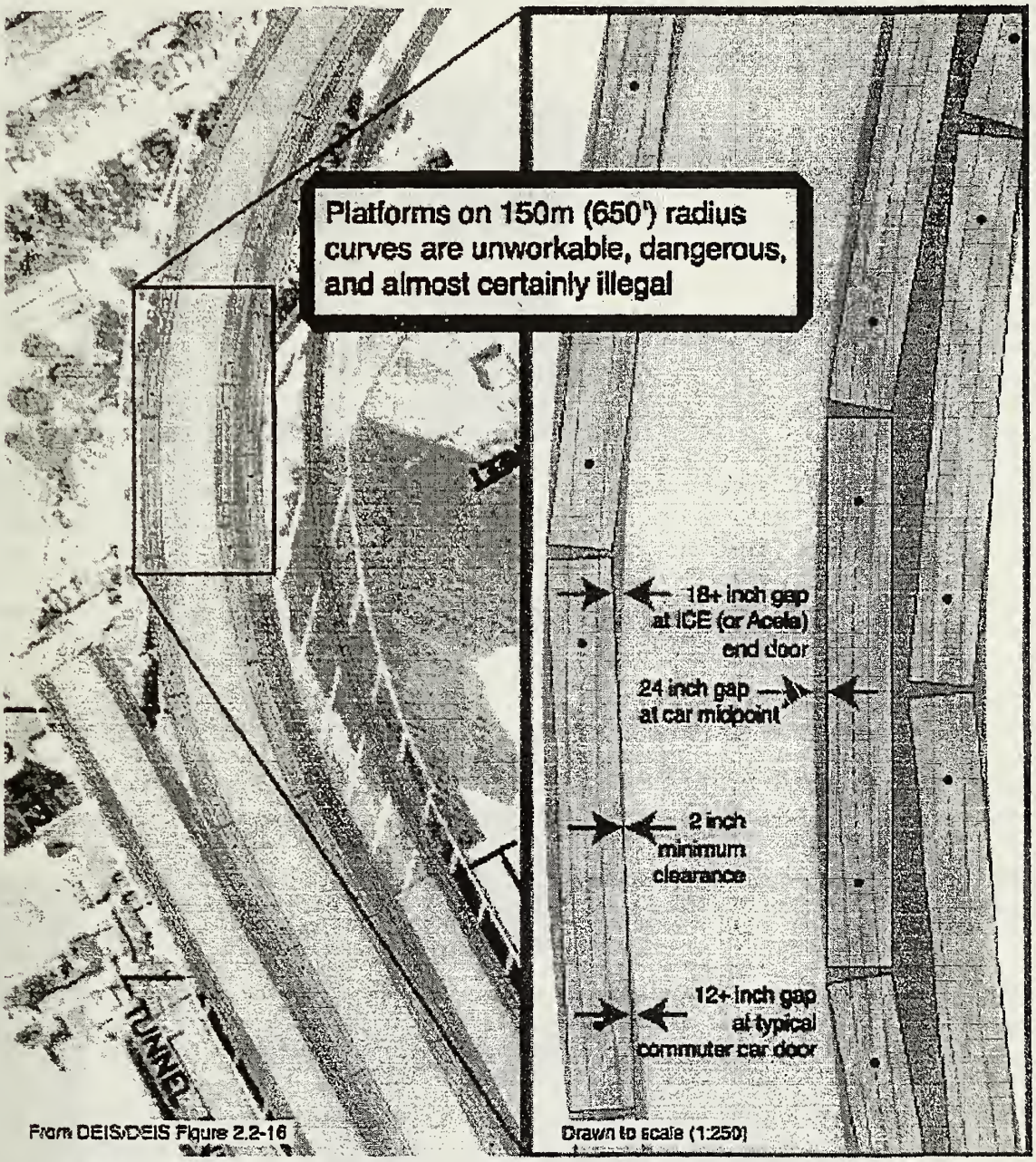


Figure 3
Transbay DEIR
December 2002

Architecture 21

West of Second Alignment
North Portal To Transbay

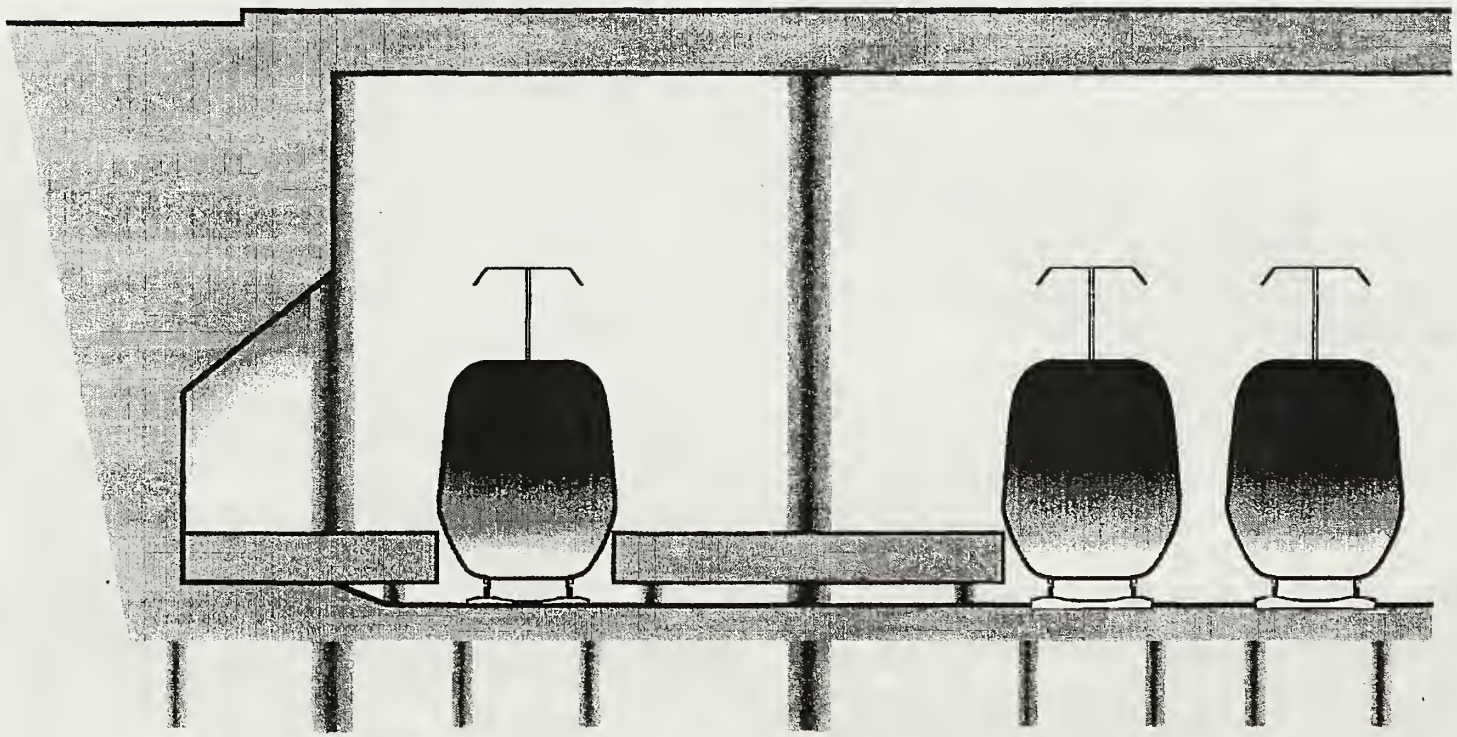


by Richard Mlynarik

Architecture 21

Figure 4
Transbay DEIR
December 2002

Platform Gaps
from the DEIR
Second to Main Alt.



Section through terminal showing side platform

Architecture 21

Figure 5
Transbay DEIR
December 2002

Terminal Basement Platforms
Side Platform Excavation

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December 16, 2002

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Mr. Paul E. Malzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, Ca. 94103-2414

Via Fax 415-558-5991

Ms. Joan A. Kugler
EIR Project Manager
San Francisco Planning Department
City and County of San Francisco
1600 Mission Street, Suite 500
San Francisco, Ca. 94103-2414

Via Fax 415-558-5991

Reference: Transbay Terminal Project - Proposed Bus Storage Parking Facility
Stillman/Perry Street - 2nd to 4th
Our Letter of July 5, 2001

Dear Ms. Kugler and Mr.Malzer;

I have spoken at the public hearings on April 4, 2001, November 12, 2002 and November 26, 2002 in opposition to the *proposed permanent location of the A C/Golden Gate Transit Bus Storage Facility* on Stillman/Perry Street.

I have reviewed the report titled Draft Environmental Impact Statement/Draft Environmental Impact Report and Draft Section 4(f) Evaluation concerning the impact analysis performed for the Bus Storage portion of the proposed project.

The report does not address the impact on our neighborhood that will be caused by placing a Bus Storage Facility for approximately 200 buses within this two (2) block area. The draft report is grossly inadequate as it pertains to the impact that diesel fumes and circulating buses will have on the Stillman/Perry Street neighborhood.

1. The report is silent on the pollution and health hazards that will be caused by the increase in diesel emissions in the neighborhood. Diesel exhaust fumes are listed by the EPA as toxic and likely to cause lung cancer in humans. The EPA has found diesel exhaust triggers asthma and other respiratory problems.

2. The report is silent on the traffic impact to the one way street and neighborhood. The report does not address bus circulation on Stillman Street. Figure 2.2-5 on page 2-14 shows the one way direction on Stillman Street being changed. Do all the Golden Gate transit buses enter Stillman from 3rd Street ? Bus circulation and the impact within the Stillman / Perry neighborhood is not addressed.

3. The Draft EIR does not address the impact of the increase in the noise level resulting from the proposed Bus Storage Facility in the center of the Stillman / Perry Street neighborhood. The report (Section 5.8.6 & 5.8.7) mentions increased noise from the Bus Storage Facility as pertaining to only one (1) Building in the neighborhood. The noise levels are not quantified. What happened to the other forty (40) Buildings that make up the immediate neighborhood surrounding the proposed Bus Storage Facility ?

4. The loss of approximately 800 parking spaces to the businesses and residents has not been mitigated by 300 parking spaces in the proposed parking deck at 4th and Stillman.

5. None of the issues and resulting impacts raised in my certified letter to Ms. Joan Kugler dated July 5, 2001 have been addressed in the Draft EIR report. We have had no response to our letter. Not even a phone call.

6. Our Neighborhood will be impacted for the next 5-7 years as the West Approach is rebuilt. Cal Trans has made public assurances in several open meetings that the parking would be returned under the West Approach at the conclusion of the project.

The extent of the impact on our neighborhood depends on which ramp alternative is selected for further study and analysis. The Loop Ramp Alternative would provide for the storage of 120 buses on the eastern open air bus ramps. This alternative along with finding a more suitable ***permanent Bus Storage Facility now*** for the Golden Gate Transit buses would eliminate the need for Stillman/Perry Street neighborhood Bus Storage Facility under the West approach.

The Draft EIR Report presents an analysis and modeling criteria (Section 5.7) for the carbon monoxide (CO) levels on 8 intersections downtown. The Draft EIR makes no mention of any analysis or modeling for the elevated levels of carbon monoxide (CO) that will be present over the ambient conditions due to diesel bus circulation, idling and warmup in the eight (8) acre site in the middle of our neighborhood. A bus storage facility will have a significant carbon monoxide (CO) level impact within the Stillman / Perry Street neighborhood that must be addressed. Many of these Buildings and residences in this two (2) block area use operable windows for code required ventilation and air changes in the structures.

The proposed location of the ***temporary*** Golden Gate Transit Bus Storage Facility during construction of the Transbay Terminal project is not identified in the Draft EIR The temporary Golden Gate Bus Storage yard should be built as the permanent facility at the ***front end*** of the project in an open air location that will not impact residents and businesses with increase diesel emissions and toxic carbon monoxide. This would also eliminate the cost of a new temporary storage facility for Golden Gate Transit.

169 Stillman Street for 18 years has seved as a private day school for up to 40 children. We are currently negotiating a new lease with a private Charter School. Locating an enclosed Bus Storage Facility across the street from our Building and circulating buses up and down the street is condemning the legal highest and best use of our Building. The State of California has banned idling buses near schools. The California Air Resources Board passed this measure on Thursday, December 12, 2002.

Your planning efforts and analysis should be directed at locating a suitable open air facility for ***all*** bus storage that can not be accommodated on the open air elevated ramps or in the new terminal design. You should be able to accommodate all buses on the open air ramps, open air lots or design adequate storage space within the proposed Transbay Terminal. Trying to circulate and store 200 plus buses in a storage area with a lid on top and surrounded by business and residents is like trying to drive square pegs in round holes, they do not fit.

We request advance notice for all meetings regarding the Transbay Terminal Project and any other meetings addressing the temporary and permanent bus storage facility locations and analysis.

I again request that you consider the alternative locations that have been presented to date and explore other suitable open air sites away from residences, schools and business. The buses that need to access the terminal should be stored in the terminal or on the open ramps and lots.

If the Stillman / Perry neighborhood continues to be proposed for the Bus Storage Facility, extensive analysis must be included in future reports with regards to air quality, noise and noise. With respect to air quality it is imperative that your analysis and modeling address levels of carbon monoxide (CO) exposure to children as well as adults as their are families in addition to a school site located in this two (2) block area.

I have attached a copy of my July 5, 2001 letter for your ready reference. We look forward to hearing from you regarding alternative locations for the proposed bus storage facility in the event the project move forward.

Sincerely,
Barnes Equipment Company

Bruce W. Barnes

cc: Mr. Harry Newhall, Speedway via fax 415-495-4129
Mr. Francis Mathews, MDC Properties via fax 415-389-1948
Mr. Dan Cliff, Cliff Companies via fax 415-648-1086

BEC
12-16-02.ltr

BARNES EQUIPMENT COMPANY

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July 5, 2001

Certified Return Receipt
7000 0520 0023 4084 6742

Ms. Joan A. Kugler
EIR Project Manager
San Francisco Planning Department
City and County of San Francisco
1600 Mission Street, Suite 500
San Francisco, Ca. 94103-2414

Reference: Transbay Terminal Project - Proposed Bus Storage Parking
Stillman Street - 2nd to 4th

Dear Ms. Kugler;

We are the Owners of the property at 169 Stillman Street in San Francisco. I spoke with you briefly after the presentation at City Hall on the evening of April 4, 2001 regarding one component of the proposed project that we are troubled by in our Neighborhood. That element is the proposed bus storage and parking facility location!

The last several years our Neighborhood has been bracing for the *temporary loss* of the two (2) public parking lots under the west approach structure to the Bay Bridge between 2nd and 4th located on land owned by the State of California. The Neighborhood (owners, tenants and residents) depend on the two (2) lots for public parking. When the Cal Trans seismic retrofit project of the west approach was disclosed to the Neighborhood 5 years ago, we were advised of the *temporary loss* of the parking during portions of the seismic retrofit and reconstruction work currently scheduled to start in the Fall of 2001. The public parking was scheduled to be returned to the Neighborhood when the project was completed. *Cal Trans promised this in a public meeting.*

The bus storage and parking component of the Trans Bay Terminal project ("Project") currently being circulated for comment and consideration has targeted the public parking area under the west approach to be used for Golden Gate Transit and AC Transit bus storage and holdover facility to service the Project. Apparently no other areas were considered which may be more appropriate for bus storage and parking than underneath an elevated structure fronted on two sides by a narrow a right of way consisting of one way streets, sidewalk, limited parking, and loading zones for our Neighborhood.

Some of the very apparent problems we foresee based on the limited details provided to date are the following;

1. The existing west approach overhead roadway structure over the proposed bus facility is heavily concentrated with large concrete abutments and columns closely spaced to support the west approach structure overhead. The lot configuration and circulation for buses is very inefficient. A tour of the numerous bus transit storage facilities in the Bay Area will demonstrate how inefficient and problematic it would be to place buses idling underneath a confined overhead structure full of bridge piers and columns.

2. The Neighborhood already has already been impacted by a heavy concentration of vehicle emissions from the west approach roadway. The existing emissions in the air at the elevated roadway level impacts the upper floors of the Buildings along Stillman and Perry with operable windows at the freeway level. It also impacts HVAC systems for these Buildings that must circulate outdoor air from roof top levels where emission are discharged from the vehicles on elevated roadways. Adding approximately 230 buses under the elevated roadway will add a significant new element of emissions and air quality problems to our Neighborhood. It will be a significant burden and impact on the businesses and residences that directly front the street level of Stillman and Perry.

3. The proposed bus storage area is bounded on the North by Perry Street with a only 35' right of way and on the South by Stillman Street with a 35'- 40' right of way with extensive encroachment into the right of way from the west approach concrete columns and abutments that line the North side of Stillman Street.

4. The businesses and residents along Stillman Street will be severely impacted by buses circulating on the existing very narrow one way street (20-22' in width from the sidewalk to the exist concrete bridge columns encroaching the right of way) in front of the Buildings on Stillman between 3rd and 4th Street. It will not be possible to unload delivery vehicles or park in the very limited street right-of-way parking if buses are circulated up and down Stillman Street and Perry Street. There will be new grid lock on the Streets that are already *choked or closed* when deliveries are made.

5. Some existing Building occupancies have City Building Code occupancy classifications that require *a minimum* of 20' clear roadways (without sidewalk, encroachment, loading zones or parking spaces) for emergency vehicles. Buses circulating up and down Stillman Street will significantly impact the traffic, loading, unloading and emergency vehicle access. It is not uncommon for portions of the street to be blocked and closed while deliveries and pickups are made with large trucks and trailers that serve the businesses and residents on the Streets.

6. The Neighborhood is already forced to endure what is currently scheduled to be 5-6 years of disruptive heavy construction work. Many of the businesses and residences on Stillman Street are within 20' of the elevated west approach roadway that will be demolished and rebuilt. Now, we are being informed that after we endure 5-6 years of disruption, the only public parking in the Neighborhood will be taken, and in its place a permanent disruption is planned - circulating and storing some 230 buses in a confined area bound by a limited right-of-way along two one way streets that are already heavily impacted.

7. The 140 Golden Gate transit buses proposed to be stored between 3rd and 4th street will have to cross 5 lanes on 3rd street to access the proposed ramps in the proposed storage area between 2nd and 3rd. This lot already has low clearance because of the existing grades and the elevated roadway. The plan for a possible Muni Central Subway in the 3rd street corridor is another obstacle. It will take years to relocate utilities and place underground structures below grade for a Central Subway up the 3rd street corridor. Buses circulating and leaving a storage area between 3rd and 4th will have to cross 3rd street to access the proposed stacked bus ramps planned to serve the Project. It is difficult to imagine the construction of a Subway project in the middle of the two proposed bus storage facilities.

It is also difficult to imagine the impact the proposed bus storage facility will have on the Neighborhood with 230 buses running and circulating in and out of the two (2) confined lots between Stillman, Perry Street, Second and Fourth Streets. The proposal to operate 230 buses out of this confined area can't be justified to the Neighborhood, nor can the additional noise, traffic and air quality impact be mitigated. Bus transit and storage facilities are planned and designed with open air storage areas without columns, roof tops and other obstruction that hinder circulation and trap emissions from idling diesel engines.

Buses idling and circulating around and under the existing west approach structure designed to support an interstate freeway rather than store buses is a poor option to spend tax payers money studying. There are existing residential units on Stillman street and more new units currently under construction.

Our Neighborhood is currently preparing for the west bay approach reconstruction project that is finally scheduled to start this fall. We would all like to see a light at the end of the reconstruction project for the Neighborhood. Our Neighborhood wants the parking back that we were promised, we do not want it turned into a bus yard full of idling diesel buses circulating in and out of the Neighborhood to the proposed Transbay Terminal.

I recently received a copy of a letter addressed to you from by Mr. Francis Mathews regarding the bus storage impact in the Neighborhood. The five alternative locations mentioned in the letter appears to be a good place for the project team to start scoping for the proposed bus storage facility element of the Project. I am sure the project team could find many additional suitable sites for the bus facility that would not have the significant impact on a Neighborhood that is already severely impacted by noise, vehicle emissions, a planned multi year major construction project, and restricted right of way and access at Street level. These sites should all be addressed in your Draft EIR as additional alternatives to study from your scoping process.

We look forward to hearing from you regarding alternative locations for the proposed bus storage facility.

Sincerely,
Barnes Equipment Company

Bruce W. Barnes

cc: Ms. Maria Ayerdi, Mayor's Transporation Advisor
Mr. Francis Mathews, MDC Properties
Neighborhood Distribution List from Meeting on April 23, 2001.

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7-05-01.ltr

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December 9, 2002

Mr. Paul Maltzer
Environmental Review Officer
S.F. Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Re: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

Dear Mr. Maltzer:

I am writing concerning the draft EIS/EIR for the above projects (hereafter "EIS"). My wife and I have lived on Folsom Street since 1992 and I am a member of the Transbay CAC.

The comments which follow relate solely to the Redevelopment Project portion of the EIS.

The EIS should contain as an additional alternative a proposal for development within or close to the existing height and bulk limits which prevail in the neighborhood of Folsom Street, namely 200-250 feet in height. The two alternatives presented involving buildings 350-400 feet high are far higher than what presently exists and is allowed. One or more alternatives closer to what presently exists would provide the public and the decision makers with a clearer understanding of what is proposed and its impact.

The EIS also needs to more fully take into account the combined impact of other projects and plans for the larger South of Market area involved, including the proposed rezoning of Rincon Hill, the two proposed projects for 300 Spear Street and 201 Folsom Street, the Cruise Ship facility, Mission Bay and the Ball Park.

For example, although the EIS recognizes that more fire suppression personnel may be required, it does not quantify the need or discuss the financial implications of it. With the other proposed 35-40 story towers on the South Side of Folsom Street the need will be obviously even greater. These combined needs, financing, etc. need to be discussed.

Similarly, the combined impact of the other projects with this Redeveopment Project needs to be taken into account in the discussion of such issues as traffic, parking, wind, shadows,

air quality and visual impact. As to visual impact, it is particularly important that the other projects also be considered in that what is proposed for both sides of Folsom Street is greatly out of proportion to what presently exists and is allowed. What is proposed by these various projects combined, including the Redevelopment Project, would drastically alter the character, views and light of the existing and still developing residential community along and close by Folsom Street. The impact of such a drastic change needs to be thoroughly explored in the EIS.

I also note what would appear to be inconsistencies between Table 5.1-1 and Figures 5.1-2 and 5.1-3. In Table 5.1-1 the Height/Bulk District shown for Block 3739 for both the Full Build and the Reduced Scope Alternatives is 350-S. Figure 5.1-2, for the same block for the Full Build Alternative, shows 400-S for one part of the block and 350-S for the remainder. Figure 5.1-3 for the same block for the Reduced Scope Alternative shows 350/400-U. Similarly, for Blocks 3736, 3737 and 3738, Table 5.1-1 shows 400-S for the Reduced Scope Alternative while Figure 5.1-3 shows 350/400-U.

The EIS also needs to consider how the needs of the combined project areas for schools, parks, supermarkets and other amenities will be met. With the Planning Department projecting 7750 more residential units than would otherwise be built under its proposed rezoning for the Rincon Hill Mixed Use District, plus over more than 5000 residential units approved for Mission Bay in addition to the 3400 to 4700 more units projected as a result of the present project, an additional population of at least 20,000 people more than would otherwise be expected would be living in this rather small area. The EIS needs to address how the needs of such a large population for parks, schools, retail and other amenities will be met.

As the South of Market area is already where most all of the new housing in the City has recently been constructed and will continue to be constructed (e.g. Mission Bay), to allow an even greater percentage of the overall new construction for the City to occur there will adversely affect the quality of life for those who now or hereafter live and work in the area. The much higher density resulting from these projects should be specifically contrasted with the density of other residential areas of San Francisco to provide a meaningful discussion of what is proposed. The type of units to be offered and the anticipated price range need to be included in the EIS so that it can be determined whether there is a realistic need for such units in San Francisco. The large number of units presently available (e.g. Bridge View Towers, Yerba Buena Lofts), as well as those already approved or under construction (e.g. Mission Bay, 333 First Street, 325 Fremont Street, 200 Brannan) should also be factored into this evaluation.

Over the past ten years a vibrant residential community has developed and continues to develop in the area along and nearby Folsom Street. The neighborhood is not a "clean slate" for someone to experiment on with a design considered appropriate for a theoretical or abstract urban neighborhood. The building of downtown-sized office buildings in this area which are out

of proportion to the buildings presently in the area would destroy its intended and existing character. The EIS needs to present a full and fair disclosure and discussion of the many issues raised by this and the other projects mentioned previously so as to enable the public and the various governmental agencies involved to determine whether what is proposed is in the best interests of the neighborhood and the City.

I can be contacted at the above address or by telephone at 415/781-5088 (work) or 415/882-7871 (home).

Very truly yours,

Reed H. Bement

Reed H. Bement

William Blackwell, Architect

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451 Pala Avenue
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December 2, 2002

Paul E. Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco CA 94103

Re: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project
Draft EIS/EIR dated October 2002
Comments (Environmental Issues) due December 6, 2002

Dear Mr. Maltzer:

I am pleased to submit the following comments on the subject document and appreciate the opportunity to do so.

In a letter dated April 16, 2001, to Joan Kugler, EIR Project Manager, I suggested an alternative Caltrain extension plan coupled with underground pedestrian connectors and an efficient terminal design. This alternative offered significant advantages consistent with the primary purposes listed on page 1-1.

Subsequently, I have amended that document to incorporate results of additional research, and am enclosing a revised version as Attachment No. 1. Many of my comments on this Draft EIS/EIR are with respect to material in this attachment, which, for purposes of identification, I am referring to as the "Blackwell Alternative".

Attachment No. 2 adds research on reversing direction of Caltrains. Attachment No. 3 is a copy of my suggested alternate plan for the bus levels that was also included in my April 16, 2001, letter to Mrs. Kugler.

Please give the material in these attachments the same weight and careful consideration that you give the comments listed herein by page number.

COMMENTS

Page 1-10. The one-mile "gap" will be partially erased for those Caltrain riders who transfer to BART at Millbrae.

Page 1-11. I don't have a copy of an August 1996 ridership report by Charles River Associates, but a later report by the High-Speed Rail Authority* put the loss at 110,000 annual riders (not 200,000) if HSR is terminated at 4th & Townsend. Assuming weekend and holiday travel at 70 per cent of normal, this loss is only 332 riders per workday. The same report places the cost of HSR extension to the Transbay Terminal

site at $270 million, which would be an incredible amount to pay for a net gain of only 332 daily riders—less than one half of one per cent of the total riders.

Simply providing long- and short-term parking spaces at 4th & Townsend would probably increase San Francisco HSR riders by double or triple that number.

* California High-Speed Rail Authority "Revised Staff Recommendations for VHS Route Adoption" July 14, 1999, page 14, stated that "By terminating the Peninsula VHS routing at the 4th & Townsend Station site, about $270 million can be saved in construction costs while reducing the length of the system by less than one mile...ridership and revenue for long-distance travelers would only be slightly less than the Transbay Terminal alternative ...110,000 less riders per year which leads to $4 million less revenue per year." Total annual riders was 23.1 million at that time, and now is projected to be 36 million.

Page 1-28. Table does not show the street vacation procedure that is required for the taking from Minna Street of a ten foot strip (510 feet long) between 1st & 2nd Streets. Minna Street is only 35-feet wide. This encroachment is unnecessary. Attachment No. 3 shows an alternate one-level plan that accomplishes everything needed within the155-foot width of the existing State property.

Page 2-3. (a) Electrification of Caltrain is currently funded only to 4th & Townsend. (b) Electrification need not necessarily be in place prior to implementation of Caltrain extension. Push-pull electric locomotives have been used in the past to move diesel-powered trains through tunnels in urban areas, notably at Pennsylvania Station in NYC.

Page 2-6. The diagram shows an underground connection to BART as a design option. The summary on page S-7 says this pedestrian connection would be to the Embarcadero Station, rather than to Montgomery Street. There is only one short paragraph in EIS/EIR (Page 5-118) and the choice of BART stations is not discussed. The BART connection is evidently not in the cost estimate.

A pedestrian concourse with horizontal passenger conveyors (Blackwell Alternative) from the Transbay Terminal to Montgomery St. BART station puts commuters closer to the center of District C-3E and, in conjunction with a 2nd Street rail platform, presents an opportunity for sublime pedestrian circulation. Moreover, Montgomery St. has the highest number of entries and exits of the Market Street BART stations (Page 3-8). These connecting links would obviously improve access to bus and rail services for a great majority of transit riders, a primary purpose of these projects (Sec. 1.1). See also Attachment No. 1.

Page 2-9. Needlessly re-locating the bus levels 40 feet and 60 feet above the street level does not improve public access to bus service, a primary purpose of these projects (Page 1-1).

Page 2-11. The West Ramp alternative itself should include an alternative that combines on one level the upper and lower bus levels proposed. See Attachment No. 3, a drawing that shows the same number of bus stations, turnout lane, turning radius, etc. on one level that are proposed for two levels. Electronic signboards at the foot of the escalators would let patrons know which of the two platforms to use, and there is

no loss in AC Transit flexibility. In the Blackwell Alternative, this bus level would be at the 20-foot level, the west ramp elevation would remain essentially as is, and retail would be partially on the street level and partially on the pedestrian concourse level below the street. See Attachment No.1 for more detail.

Page 2-35. (a) The grade crossing planned at Common Street will prevent use of these tracks by HSR. (b) The six platform tracks on the surface cannot be used for trains continuing to the downtown terminus – such as non-electrified trains, for example. See page 2-3 (b) comment re electrification. (c) The platforms for the surface tracks are not long enough for special event trains. Caltrain has said that 1,000 feet is needed.

Page 2-36. (a) The Blackwell Alternative deletes the need to acquire 18 parcels of land and demolish eleven buildings for the HSR curve into the Terminal.

Page 2-46, Redevelopment Scenarios. BART, MUNI, Caltrain, and AC Transit stations, when fully inter-connected, will provide San Francisco with a regional commuter transit facility of unparalleled convenience in the heart of the downtown. Current market conditions not withstanding, the buildable parcels within a ten-minute walking distance of the Caltrain terminus, the Transbay Terminal, BART/MUNI Montgomery and Embarcadero Stations, and even the Ferry Building would ideally be predominantly office space. Office space development within close proximity would give maximum reinforcement to the investment in a regional transit facility. Ten minutes, incidentally, equates to a walking distance of one-half mile at 3 mph, a dimension that should be adjusted for topography.

The predominantly residential component proposed for both scenarios of the redevelopment activity is appealing because it addresses housing needs, but it has several disadvantages: (1) It displaces office space as outlined above, contributing to downtown sprawl. (2) It brings a new layer of pedestrian and vehicle traffic to an already congested downtown— moving vans, delivery trucks, more taxi and private cars, and on the sidewalks, more seniors, joggers, small children, baby carriages, and pets.

Housing that will enable more people to live near where they work is an urgent necessity, but there are many parts of the City with residential amenities already in place—schools, shopping, parks and playgrounds—that are far better suited for residential development than is the heart of the downtown. These neighborhoods need only improved transportation to be close to the downtown area.

Page 2-47. The reasons given for not renovating the existing terminal building tend to vanish in light of the Blackwell Alternative. Caltrain and high-speed rail are cleanly separated from the terminal; removal of the east bus ramp is still feasible. The single level plan shown in Attachment No. 3 could be implemented on the existing bus level. An elegant new roof could be installed over the bus platform. The lower floors plus sub-level (now garage) of the existing terminal offer ample opportunity for revenue-generating joint development. A Minna Street underground concourse link to Caltrain at 2nd St. and thence to BART Montgomery, is a simple addition. Opportunities for major improvements in space utilization, passenger circulation, signage, security, and safety are not precluded. Renovation would require the ablest architects and engineers, but it is certainly not out of the question.

Page 2-49, Alternatives Considered and Withdrawn, does not include the Blackwell Alternative described in Attachment No. 1. This is a carefully researched and reasonable alternative that was submitted within the public comment period prior to commencement of this Draft EIS/EIR.

Page 2-50. The Essex St. stub-end technical analysis is erroneous on several counts. Caltrain at present operates successfully with sub-end, not "pass through" tracks. Storage/by-pass tracks can also be provided at the stub-end. Reversing train direction is routinely done now and, in any case, does not present an operating problem that would impact schedule. Most northbound and southbound trains will make station stops at both 4th & Townsend and at the downtown terminus. See Attachment No. 2. Internal passenger circulation (with, for example, horizontal passenger conveyors) can be as clear and elegant as in the proposed, better even because the tracks do not need to be so far underground. The paragraph does not address the advantages of separating Caltrain extension form the Transbay Terminal Improvement Project.

Page 3-31 (bottom) - Setting the south boundary of the traffic study area at Bryant Street excludes 16th Street (as well as the extension of Common Street) from consideration in this EIS/EIR. Unless these streets are closed to vehicular traffic or grade separation is provided, there can be no high-speed rail service to downtown San Francisco.

Common Street might be closed but Sixteenth Street between 3rd & 7th Streets is classified as a major arterial. The balance to the Misson Street BART Station is classified as a secondary arterial. MUNI ultimately plans a surface light rail line on 16th Street. It is unlikely that this street can be closed. If an underpass is provided, access to 7th will be curtailed and there will be other traffic impacts. On the other hand, if all of the tracks are undergrounded before reaching 16th Street, the plans for the surface tracks at 4th & Townsend (page 2-25 and 2-26) no longer apply. There would also be a conflict with the major sewer collector on piles (shown in the profile drawing on page 2-24) to be resolved.

Page 5-93, bottom paragraph - Assuming similar sleek structural designs for the one-level ramp, the stacked ramps illustrated in Figure 5.16-2 would <u>not</u> be less visually obtrusive than a single ramp. (The title of the simulated drawing is confusing – should be" looking NW on Howard St. from about 2nd Street")

Page 5-94. The upper elevation drawing shows that the portion of the proposed terminal that crosses over both 1st and Fremont Streets begins about 20-feet above the street level and extends to the terminal roof height of 109-feet. The existing building also begins about 20-feet above street level but is only 40-feet high. The Blackwell Alternative would also have only one level (but of improved design) crossing these streets. As in Figure 6.16-2, a simulated visual comparison should be shown that illustrates the significant adverse impact of the proposed design on the views up and down on both 1st and Fremont Streets.

Page 5-118. Pedestrian tunnel if under Fremont Street would be to the BART Embarcadero Station rather than Montgomery Street. See comment, page 2-6. These spacious pedestrian tunnels with moving walkways would greatly <u>enhance public access to bus and rail services</u>, a primary purpose of these projects. See the detail

drawing of the underground pedestrian intersection at 2nd & Minna included with Attachment No.1.

Page 5-159. Table 5.20-4 shows 658,100 cubic yards of excavation materials for the terminal, but Table 5.21-1 on page 5-168 shows only 125,000 cubic yards for the terminal and a very low truck volume. Why the discrepancy? At 2,500 cubic yards per workday (180 trucks) this trainbox excavation will take about one year. The Blackwell Alternative deletes this requirement for a very deep and costly trainbox excavation.

Page 6-8, Table 6.6-1. I have been told that Proposition 42 can be expected to provide at most only $100 million for these projects, not the $600 ± million shown. How is this shortfall to be made up?

OTHER: Conservation of Natural Resources and Energy

This item is not included in the Draft EIS/EIR but might be significant enough to be included.

More than any other single factor, size determines the quantity of materials required for a project. The "Blackwell Alternative" effectively changes the design of the terminal from 5-1/2 levels to 3 levels without curtailing services. As a first approximation, this is a 45 per cent reduction in size that would reduce the consumption of building materials, and the energy required to manufacture and transport the materials, by a like amount. In this case, the opportunity to conserve natural resources and energy by size reduction is very substantial and might well be evaluated in an EIS/EIR concerned with environmental impacts.

Please call if you have any questions.

Sincerely,

William Blackwell

William Blackwell

Enclosures: Attachments (3)
Copy: Steve Heminger, MTC

The "Blackwell" Alternative

The Transbay Terminal plan approved by the Executive Committee of the Transbay Panel includes an underground six-track, three-platform rail terminal 50 feet below the surface for Caltrain and high-speed rail. Trains enter and leave by way of a two-track tunnel from 4th & Townsend that proceeds north under Second Street and then makes a wide turn into an underground train box. Tail tracks may be added beyond the terminal to store and stage trains. Until the time when tracks are extended to a new transbay tube, all of these tracks are stub end tracks. A design option is included for possible future pedestrian connection to the BART/Muni Metro Embarcadero Station, but funding is not provided for this option.

A two-track, one-platform rail terminus at 2nd and Minna Streets, in conjunction with underground pedestrian concourses connecting to BART at Montgomery Street and to an efficient station at the Transbay Terminal (TBT), is an attractive alternative to the approved plan. It is an arrangement that enhances connectivity and reduces cost.

Horizontal passenger conveyors (people movers) on the train platform and in the underground concourses, in effect, "shorten" the travel distances between all three of the major transit elements. Proximity of TBT and Caltrain to the BART/Muni Metro Montgomery Street Station, rather than to the Embarcadero Station, is a major bonus for commuters employed in the financial district. From the point of view of virtually all transit users, this is a beneficial arrangement. It also greatly simplifies construction. See drawing on page 7.

PRINCIPAL ADVANTAGES

- Enhances connectivity between Caltrain and other major transit systems.
- Reduces travel time and adds convenience for both bus and train riders.
- Reduces the combined cost of TBT and Caltrain extension.
- Meets the requirements of San Francisco Proposition H. The present plan does not.
- Allows Caltrain extension to proceed independently of TBT, which has several problems that could delay construction, possibly for years; conversely, allows TBT to be constructed without waiting for Caltrain Extension.

DISCUSSION

1. Does a two-track platform on Second Street have enough capacity for the level of train service contemplated, now and in the foreseeable future?

Two stub-end tracks and a wide passenger platform can be constructed underground within the Second Street R.O.W. The platform can accommodate horizontal passenger conveyors down the center that will effectively shorten walking distance—especially

important if quarter-mile long platforms are needed for HSR. There are no existing underground utilities under Second Street that restrict construction.

With an average dwell time of two minutes—the time allotted for high-speed rail stops at intermediate stations—and another 60 seconds for trains to enter and leave the station, two stub-end platform tracks can accommodate 40 trains per hour. Keep in mind that trains now travel backwards as easily as forward.

Caltrain:

Caltrain currently runs 76 trains in and out of 4th & Townsend every weekday, but never more than 8 per hour even at the height of the morning commute, according to the timetable effective August 26, 2002. For the horizon year of 2020, the Caltrain operating scenario in the Draft EIS/EIR assumes 170 trains a day but never more than 12 trains per hour during a.m. and p.m. peaks. Curiously, the number of trains per day increases by 124 per cent but the peak hour increase is only 50 per cent.

A platform with a capacity for 40 trains per hour will accommodate five times the current Caltrain peak and three times the year 2020 forecast peak.

At present, Caltrain commuter trains are only five cars in length. A 750-foot long platform at the downtown extension can easily accommodate 8-car trains. With 8-car trains, a two-track platform has a capacity that is eight times the current peak hour Caltrain activity!

In addition to two mainline tracks, Second Street is wide enough for three storage/by-pass tracks that provide operational flexibility at the stub-end. The concept would also retain intact (although underground) tracks at 4th & Townsend for train storage, staging, and light servicing that is within two minutes of the stub-end. The Long Island Railroad successfully operates 452 trains a day in and out of Pennsylvania Station in NYC using storage yards that are remote but within two minutes.

High-Speed Rail:

Unless 16th Street is closed to cross traffic, which seems unlikely because of its importance to Mission Bay, or grade separation is provided, there can be no high-speed rail service to San Francisco.

The final report of the Intercity High-Speed Rail Commission, December 1966, stated that "to attain the safety record of high-speed trains in other countries, California's system must be entirely fenced and grade separated (no rail/roadway intersections)." The June 2000 final business plan of the California High-Speed Rail Authority said, "The system will be completely grade separated, with no potential for conflict with pedestrian or vehicular traffic."

Assuming, however, that an engineering solution is found that permits grade separation at 16th Street, the year 2020 timetable for high-speed rail shows 132 trains per day in and out of San Francisco – but never more than 10 trains per hour. Thirty-six of the 132 trains provide service to Sacramento by way of Los Banos and Fresno.

Ten trains per hour could be on the high side. Dan Leavitt, Deputy Director of the California High Speed Rail Authority, said that because of traffic and other concerns, only express trains might continue to the Transbay Terminal, the remainder terminating at 4th & Townsend. Alternatively, some trains slated for San Francisco might be routed from San Jose up the East Bay side to Oakland and eventually to Sacramento by an improved Capital Corridor route.

Two stub-end platform tracks provide nearly twice the capacity needed for the combined peak hour service projected for Caltrain and HSR in the horizon year of 2020.

Reductions in dwell time could increase the capacity of a two-track platform by 50 per cent or more. Caltrain dwell time at intermediate stations is currently less then 2 minutes but BART dwell time is less then 30 seconds! Unlike Caltrain, BART cars have only one level and station platforms are at the height of the car floors—there are no steps to impede passenger flow— and several sets of entrance and exits doors are provided in each car.

The inescapable conclusion is that the rail plan developed by MTC consultants is far more elaborate then needed to meet present and future downtown rail requirements.

Adding more platform tracks allows longer dwell times but does not increase the maximum throughput of a station. No matter how many platform tracks are provided, the throughput will be governed by the maximum feasible in a two-track tunnel, never likely to exceed 60 trains per hour, the limit with BART's new advanced automatic train control system.

The MTC consultant's report states that the rebuilt Transbay Terminal has the capacity for 300,000 daily train/bus passengers. This is 4 times the number of riders projected for the year 2020 and would require 4 times the number of trains and buses. The number of bus bays cannot possibly be quadrupled nor can the number of train platform tracks. Even if the terminal had the capacity for this number of train platforms and bus bays, there is not the street and sidewalk capacity for 300,000 daily riders nor is there isn't enough land available anywhere near the terminal to build 45 million square feet or so of additional office space needed for this number of new commuters. At present, the whole of the financial district has only 44 million square feet of office space.

2. BART/Muni Metro Connection

Proposition H requires the terminal design to "yield the highest possible transit use by residents and commuters." It also requires that the terminal design "afford senior citizens, persons with disabilities, and other commuters with the most convenient connections between regional bus lines, Muni, Caltrain, and BART."

The most convenient connection from TBT to BART/Muni Metro is an underground concourse with moving sidewalks to the Montgomery Street Station, a trip that will take the average commuter slightly over five minutes on the people mover. The same trip

over surface sidewalks and three street crossings takes from 7.5 to 9 minutes – longer for persons slowed by luggage, small children, age, disability, or inclement weather.

If Caltrain terminates at 2nd & Minna Streets, approximately at the mid-point of this underground concourses linking TBT and BART, train access will be very convenient for commuters going either to the financial district or to the terminal. It will take just over 2 minutes to go from the train platform to the BART / Muni mezzanine level at 2nd & Market, and about 3 minutes to reach the center of the Transbay Terminal.

Commuters are almost always in a hurry. Even on a perfect weather day, many will choose the underground concourse because it saves time.

High-speed rail passengers and BART SFO passengers with luggage will most assuredly prefer a people mover to interconnect between TBT buses, BART/Muni, HSR, and Caltrain.

Although the Embarcadero BART/Muni Metro Station is closer to the Transbay Terminal and Ferry Building, the Montgomery Street Station at 2nd & Market is closer to the heart of the financial district, which has two-thirds of all office space in San Francisco. In fact, early studies for Caltrain extension scored location options based on relative proximity to 2nd & Market. The underground route from the TBT via 2nd & Minna to Montgomery & Market Streets is ideal for connecting with Caltrain.

Morning BART trains from the East Bay discharge riders at both Embarcadero and Montgomery Stations, which means there will be at least standing room for westbound passengers to board at Montgomery Station. Because it is near the end of the line, Muni-Metro will also have room for passengers in both directions.

The underground concourses can be a lively aspect of the terminal, featuring retail stores and restaurants that have "breakthroughs" to shops and stores on the street level. Underground satellite restaurants have been hailed as the most successful feature of the recent remodeling of Grand Central Station in New York City.

3. COST

Prop H requires the design to "result in the lowest feasible combined costs for construction of the bus terminal and the Caltrain station, without sacrificing the aesthetic qualities of the terminal and station and their interface with surrounding development."

Ending Caltrain at 2nd & Minna results in a lower combined cost than the proposed design. The shorter rail route is also shallower, deletes one curve under buildings, can be constructed in part with cut and cover, deletes the huge excavation and shell needed for the trainbox under the terminal, and deletes the tail tracks.

Deleting the curve alone deletes the acquisition and demolition costs of 18 parcels of land with 11 buildings [Draft EIS/EIR page 2-36.]

If the terminal design were revised consistent with the Caltrain extension and underground concourse in this proposal, it would have only three levels rather than the

proposed 5-1/2 levels, and its staggering $1 billion cost would come down roughly in proportion.

An underground concourse with horizontal passenger conveyors to BART/Muni Metro is not included in the TBT plan, although the concept is clearly mandated by Proposition H. If this feature had been included, added cost of the conveyors would be nil.

The 2nd Street rail concept is entirely underground and can have no possible adverse effect on aesthetic quality.

A larger issue is the very low cost/benefit ratio of the Caltrain Extension Project when compared with other transportation projects. See the table on page 13.

Cost of the extension project is now $849 million. Electrification of Caltrain at $602 million and Phase 1 of the Caltrain Express Project (Baby Bullet) at $127 million are separate and additional JPB projects. The grand total is $1.58 billion.

The Caltrain ridership forecast in the Draft EIS/EIR is for 29,307 train riders per weekday at the Transbay Terminal in the year 2020. This number equates to roughly 15,000 commuters per day who will directly benefit from the expenditure.

Caltrain extension, incidentally, is not necessarily dependent on electrification of the entire Caltrain system, a project that might best be delayed until it can be done jointly with high-speed rail. For air quality reasons, New York City prohibited steam and diesel powered locomotives within city limits. Until all commuter rail systems converted to electric, Penn Station successfully used supplemental electric locomotives to move trains underground in and out of the city.

A related consideration is BART extension to SFO, that will enable Caltrain passengers to transfer to BART at Millbrae and reach downtown destinations near any of the four BART station locations on Market Street. The new Millbrae Station is designed for cross-platform transfer between BART and Caltrain.

The BART fare from Millbrae to Montgomery Street Station will be $4.70. The trip will take 32 minutes plus the time to transfer. BART makes 11 intermediate stops.

Only 75¢ will be added to the train fare for peninsula commuters who elect to remain on Caltrain to 4th & Townsend. The Caltrain ride from Millbrae to 4th & Townsend takes 29 minutes with 5 intermediate stops. Most commuters must then add transfer time, $1 Muni fare, and at least 10 minutes more travel time to reach downtown destinations.

4. Supplemental Notes

a) For the foreseeable future, the northern California terminus of HSR likely will be at the San Jose Diridon Station rather than in San Francisco. Senate Bill 1856, authorizes a $9 billion general obligation bond for the November 2004 ballot, which is enough to construct high-speed rail from Los Angeles to San Jose (by way of Fresno and Los Banos) but is not enough to continue HSR to San Francisco. Rod Diridon has stated that an additional $2 billion is needed to reach San Francisco. Thus, for a period of unknown

duration, San Francisco bound HSR passengers will transfer to the Caltrain "Baby Bullet" at San Jose, which puts added importance on the extension of Caltrain to the downtown financial district of San Francisco. The Baby Bullet trip from San Jose to 4th & Townsend is expected to take 55 minutes or less.

Without the possibility of a new transbay tube, San Jose has a strategic advantage over San Francisco for the location of the HSR terminus that may be difficult for San Francisco to overcome.

b) Even with a downtown extension, Caltrain plans to retain a station stop at 4th & Townsend Moreover, the 4th & Townsend site has major advantages for HSR—notably much more space, better traffic access, lower cost, and reduced travel time. Unlike Caltrain, HSR has space requirements for ancillary activities such as postal and freight, car rental, passengers with luggage requiring auto and taxi service, etc. The provision of long- and short-term parking at 4th & Townsend would be a major enhancement for HSR in competition with air travel and for Caltrain reverse commuters. San Jose and Oakland airports each provide about 5,000 parking spaces for air travelers. A like number can be provided at 4th & Townsend but would be impossible to provide at the Transbay Terminal site, even if desirable.

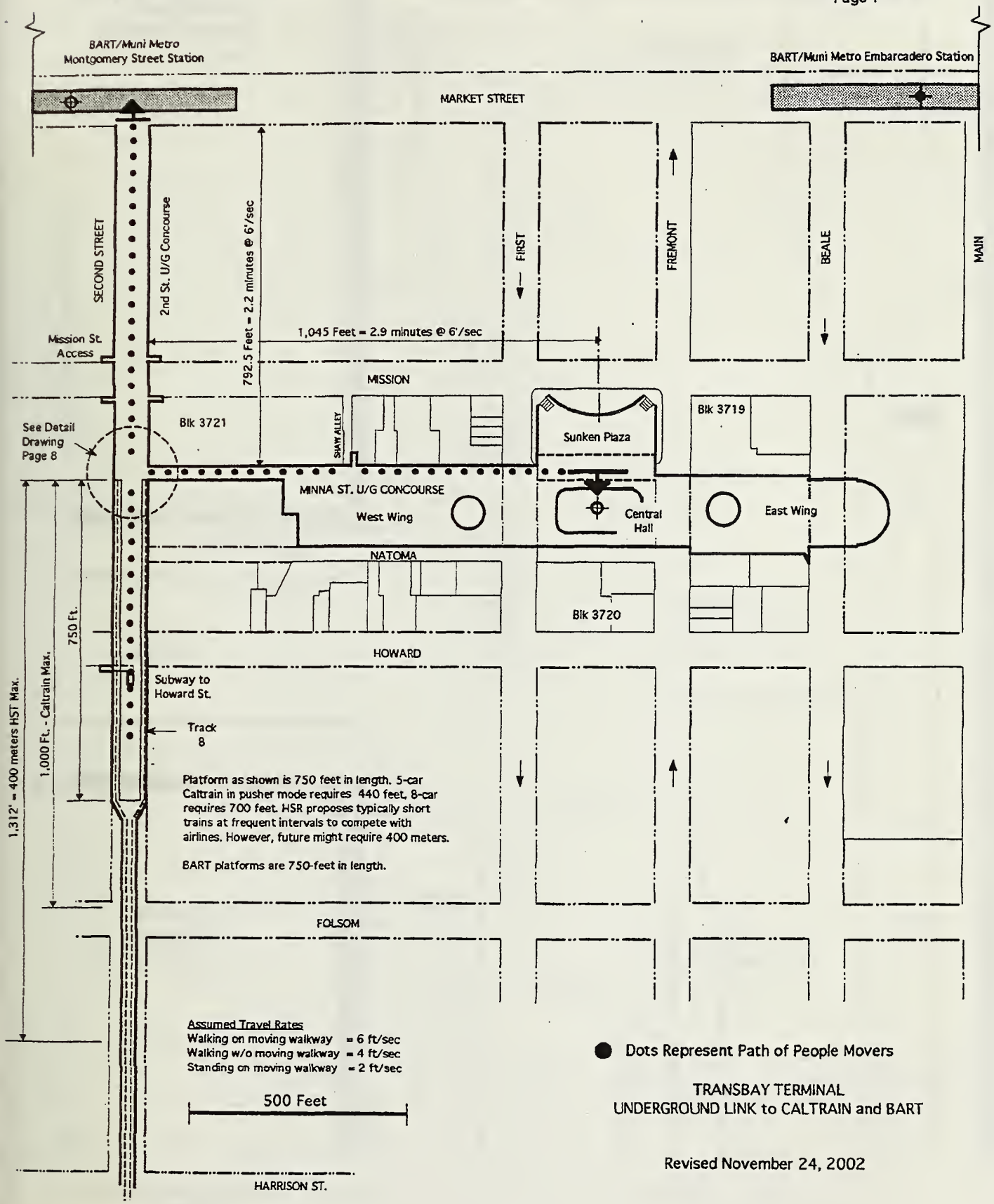
The City of San Francisco has an opportunity for two great facilities— a grand train station with all the amenities at 4th & Townsend and a downtown multi-modal facility providing commuters with unparalleled public transit convenience.

c) Financing: In 1999 the City Controller's statement on Proposition H stated that "as a member of the Joint Powers Board, the City of San Francisco would be responsible for one third of the cost of capital improvements." At that time, the cost of the capital improvements was $621 million for the extension and $254 million for Caltrain electrification. The cost of rebuilding the Transbay Terminal was not included.

These Caltrain extension costs are now at $849 million and $602 million respectively. San Francisco's obligation under Proposition H has increased from $292 million to $484 million in just three years.

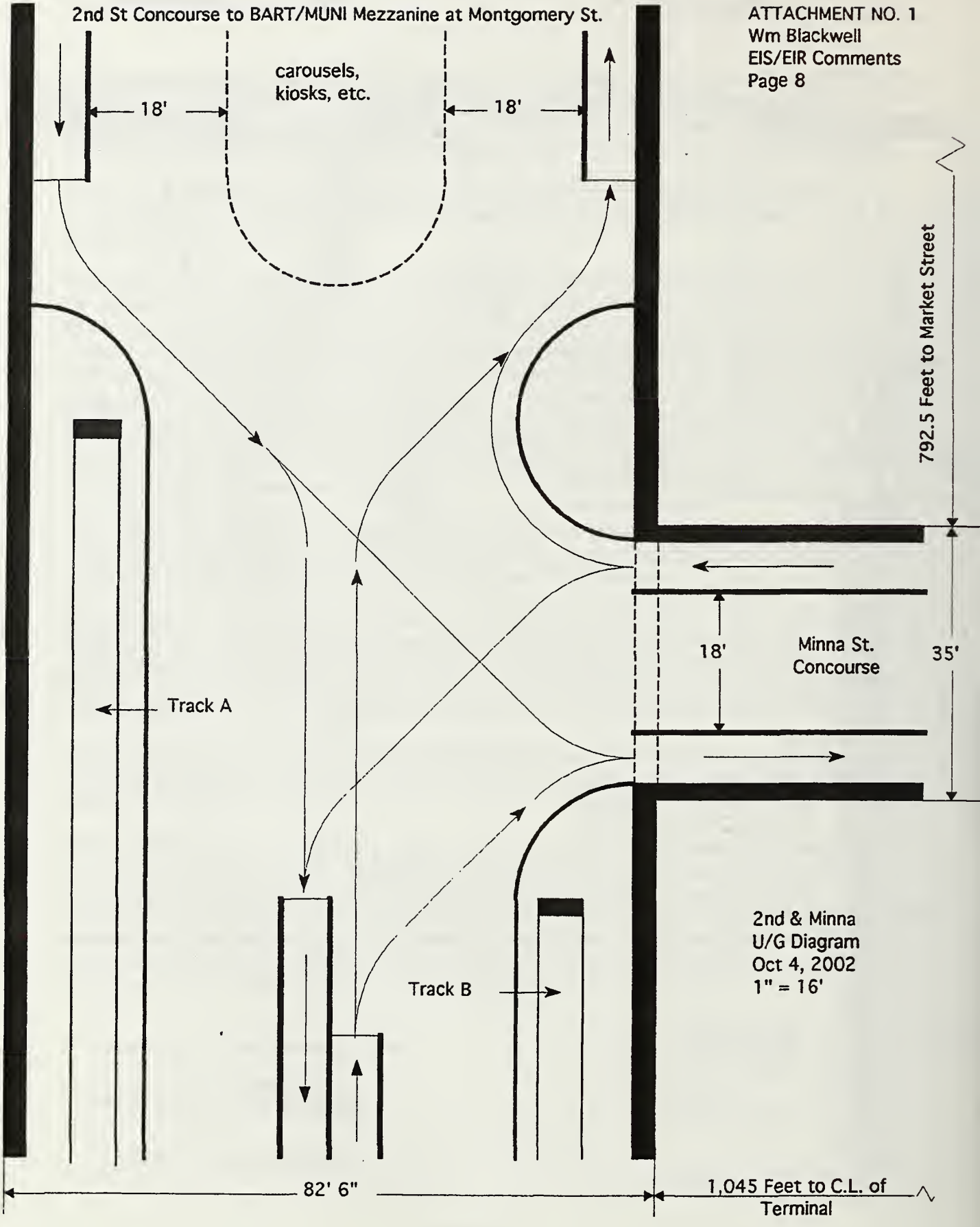
The Controller assumed that this funding would be by state and federal governments and by regional transportation agencies, and not from General Fund monies. However, the Controller said that the Caltrain Extension Project "would compete with other transportation projects, and funding this project may mean that other transportation projects important to the City would not be funded." Thus, there is added incentive for the San Francisco County Transportation Authority to ensure that San Francisco gets the highest value for each transportation dollar spent on these projects.

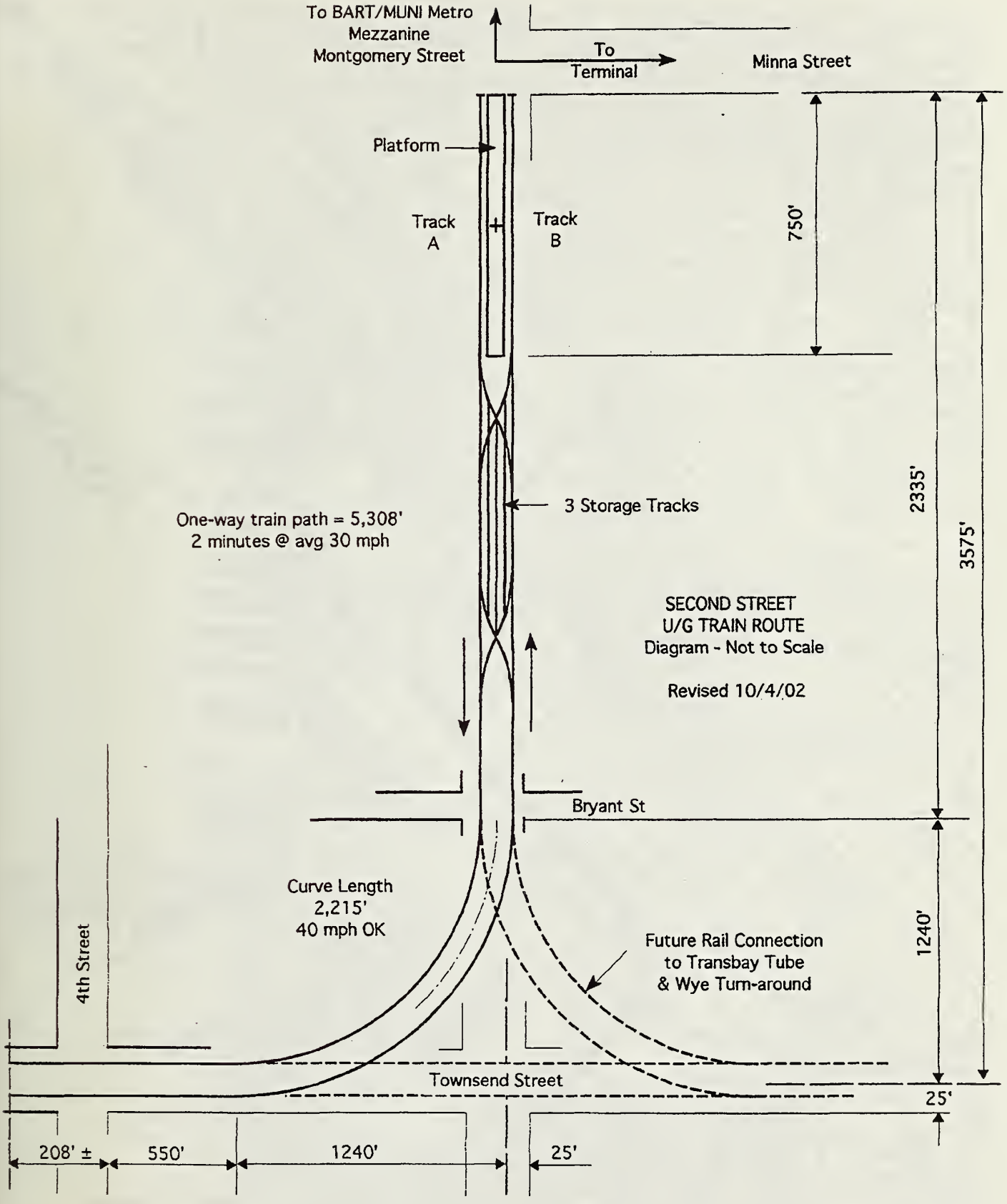
# # #



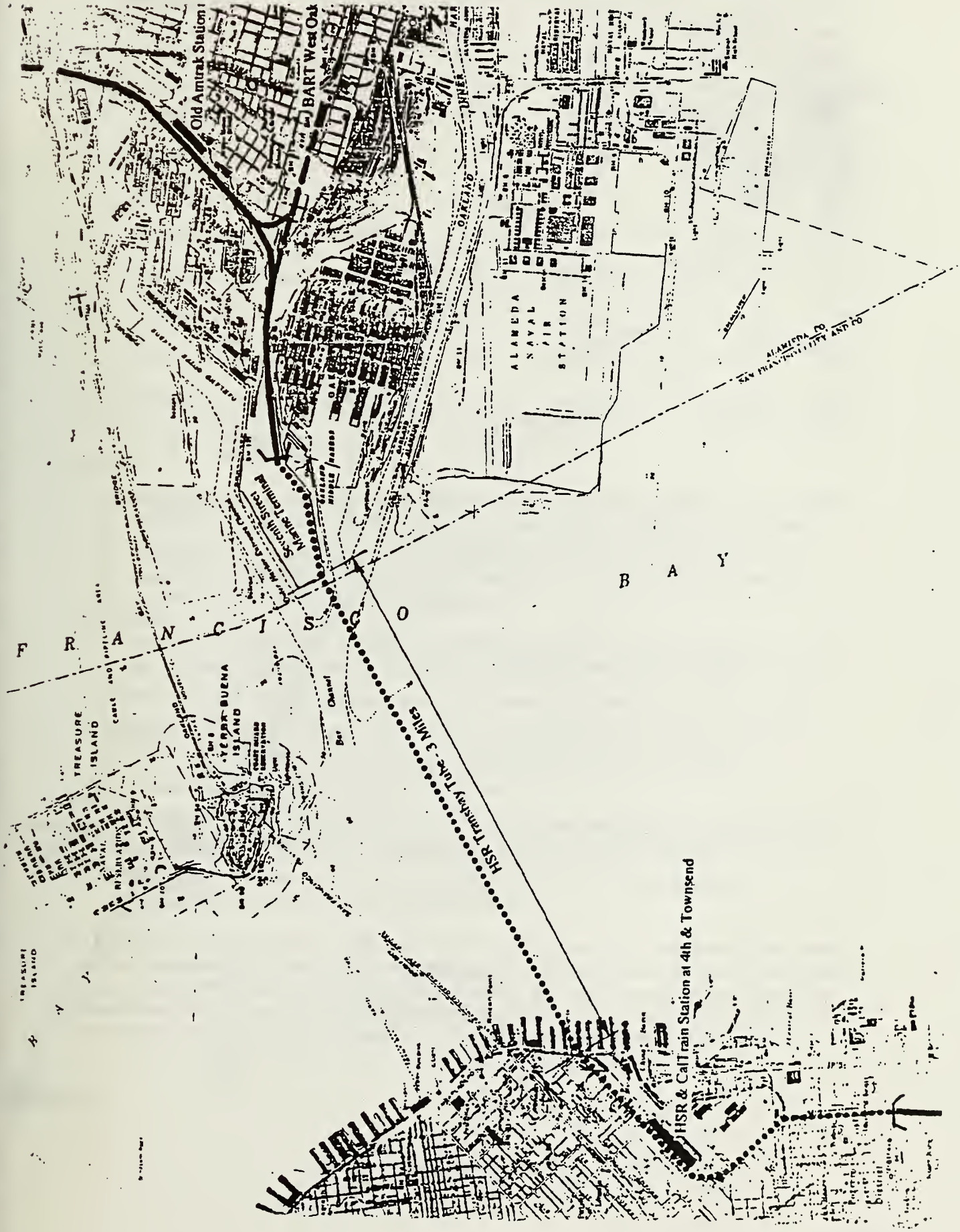
TRANSBAY TERMINAL
UNDERGROUND LINK to CALTRAIN and BART

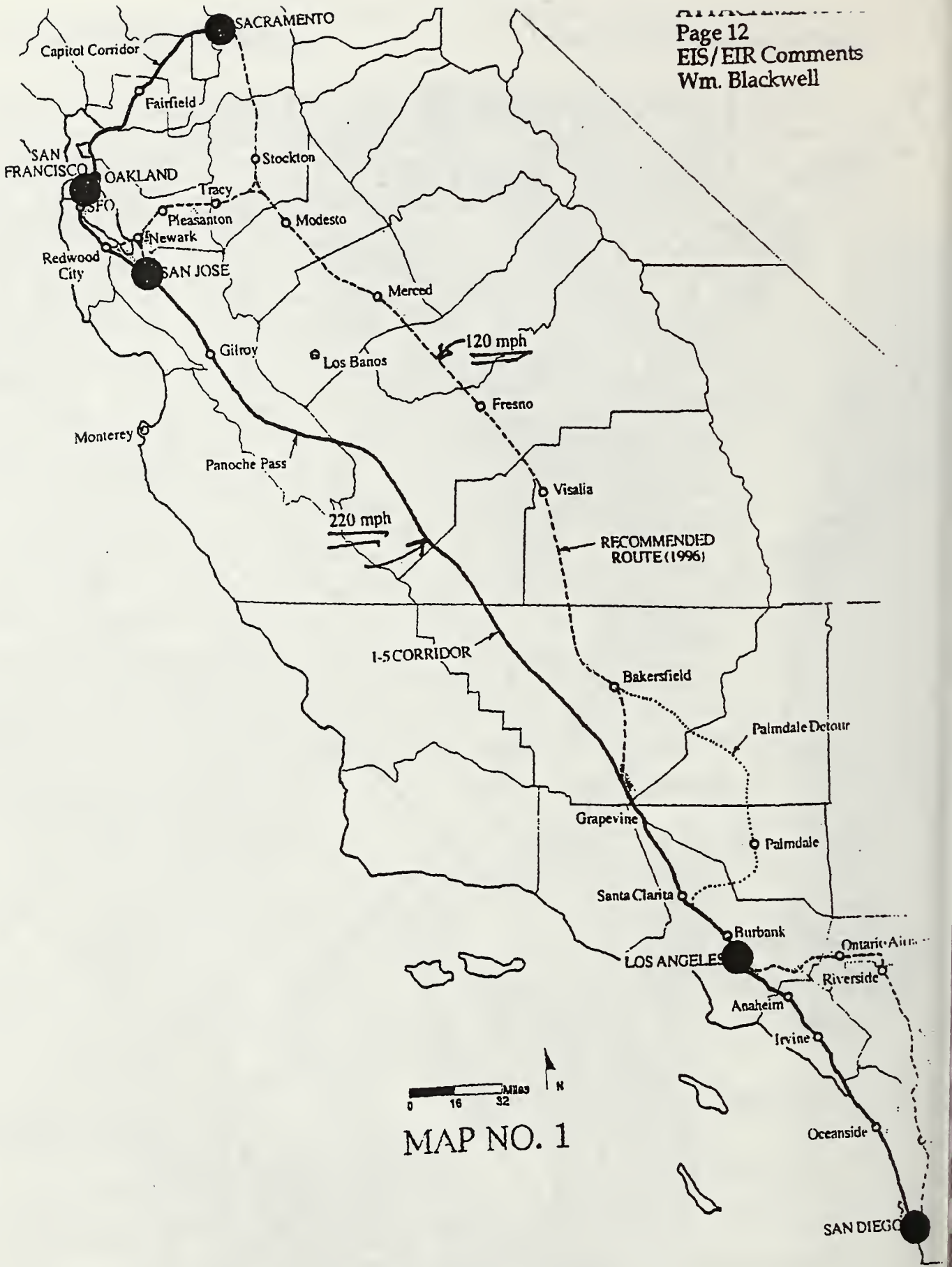
Revised November 24, 2002


2nd St Concourse to BART/MUNI Mezzanine at Montgomery St.
carousels,
kiosks, etc.
18'
18'
792.5 Feet to Market Street
18'
Minna St.
Concourse
35'
Track A
Track B
2nd & Minna
U/G Diagram
Oct 4, 2002
1" = 16'
82' 6"
1,045 Feet to C.L. of
Terminal


To BART/MUNI Metro
Mezzanine
Montgomery Street
To
Terminal
Minna Street
Platform
Track
A
Track
B
750'
2335'
3575'
3 Storage Tracks
One-way train path = 5,308'
2 minutes @ avg 30 mph
SECOND STREET
U/G TRAIN ROUTE
Diagram - Not to Scale
Revised 10/4/02
Bryant St
Curve Length
2,215'
40 mph OK
Future Rail Connection
to Transbay Tube
& Wye Turn-around
1240'
4th Street
Townsend Street
25'
208' ±
550'
1240'
25'

Chinatown
Customhouse
Heliport
TRANS-BAY
FERRY BUILDING
Light
EMBARCADERO
Post Office
Transbay Terminal
SAN FRANCISCO-OAKLAND BAY BRI
6 LANE
Union Square
BART/Muni Montgomery Sta.
Pedestrain Way
2nd St. Rail Terminus
Rincon Hill
Transbay Tube (Future)
Lights
MARKET
HOWARD
4th Street
Old Mint Building
St Patrick Sch
Lincoln Sch
5th St. Shuttle
Bessie Carmichael Sch
Hall of Justice
4th & Townsend Station
China Basin
Light
Mission Rock Terminal
Light
Light
3rd Street Light Rail
Central Basin
Jackson Park
Franklin Sq


Old Amtrak Station
BART West Oak
ALAMEDA NAVAL AIR STATION
ALAMEDA PO
SAN FRANCISCO BAY AND PO
Seventh Street Marine Terminal
SAN FRANCISCO BAY
TREASURE ISLAND
YERBA BUENA ISLAND
HSR Transbay Tube - 3 Miles
HSR & CalTrain Station at 4th & Townsend


SACRAMENTO
Capitol Corridor
Fairfield
SAN FRANCISCO
OAKLAND
SFO
Tracy
Stockton
Pleasanton
Modesto
Newark
Redwood City
SAN JOSE
Merced
120 mph
Gilroy
Los Banos
Fresno
Monterey
Panoche Pass
Visalia
220 mph
RECOMMENDED ROUTE (1996)
I-5 CORRIDOR
Bakersfield
Palmdale Detour
Grapevine
Palmdale
Santa Clarita
Burbank
LOS ANGELES
Ontario Airport
Riverside
Anaheim
Irvine
Oceanside
SAN DIEGO
Miles
0
16
32
N

MAP NO. 1

COMPARATIVE PROJECT COST PER DAILY USER

Note	Project	Approx. Cost (millions)	Number of daily users*	Cost per Daily User	Multiple to equal TBT
a	TRANSBAY TERMINAL, bus only	$ 1,052	20,000	$ 52,600	0.0
b	Caltrain Extension	$ 849	15,000	$ 56,600	0.9
c	BART Extension to SFO	$ 1,500	46,600	$ 32,189	1.6
d	SFO New International Terminal	$ 840	32,877	$ 25,550	2.1
e	Bay Bridge - East Span	$ 2,620	228,500	$ 11,466	4.6
f	Pacific Bell Park	$ 300	42,000	$ 7,143	7.4
g	Penn Station Remodel	$ 800	250,000	$ 3,200	16.4
h	Grand Central Station Remodel	$ 391	250,000	$ 1,564	33.6

NOTES:

a Total project development cost dated 1/26/01 is $1,052,302,227; includes temporary facilities. MTC year 2020 daily bus ridership is 35,000 — equates to about 20,000 daily commuters*

b Cost is Caltrain extension as of Dec 19, 2001 (MTC Draft RTEP). Year 2020 daily Caltrain riders is 29,307 (Draft EIS/EIR October 2002), which equates to about 15,000 commuters. Caltrain electrification ($600 million) is not included.

c $1.5B cost and ridership of 68,000 per day (Vicky Wills BART PIO 3/14/01.); Assume 25,200 are air passengers and remainder are daily commuters, total user per day = 46,600.

d SFO Fact Sheet 7/2000, 12 million international passengers in year 2006 = 32,877 per day

e 282,000 vehicles per day (Year 2000) at avg. 1.62 persons per vehicle (Caltrans 1991); divided by 2 = approx. 228,500 commuters; cost of $2.62 B is as of April 5, 2001.

f Cost and number of seats 1/24/99 - SF Examiner

g NY Times, 12/10/2000 - 300,000 train + 200,000 subway passengers = 250,000 commuters Only 7.4% are Amtrak, others are commute lines. 750 trains per day, 21 platform tracks.

h NY Times, 8/2/1998 - Cost includes $110 million for network of u/g passageways 550 commuter trains per day on 45 platform tracks.

* For weekday commuter systems such as Caltrain, riders per day divided by two equals approx. number of daily commuters. In the case of AC Transit, however, car-pooling in the a.m. changes number of daily users to about 60% of total AC Transit cross-bay ridership. AC Transit accounts for about two-thirds of total daily bus ridership. Hence, estimate of 20,000 commuters for bus-only terminal with 35,000 riders per day as shown in table on page 3, MTC consultants brochure, January 2001.

Reversing Train Direction

The success of the "Blackwell Alternative" to extend Caltrain to 2nd & Minna, where there is room for only two platform tracks, depends on short turnaround times. If short turnaround times are feasible, a two-track station may be all that is needed for the level of downtown service contemplated by both Caltrain and the California High-Speed Rail System.

According to trainmen at 4th & Townsend, northbound Caltrains are typically in the "pusher" mode, i.e., with the locomotive at the rear and the operating engineer in a cab car at the front. Commuter trains have five cars and are less than 500 feet in length including the locomotive. Special event trains are longer. At present, trains with more than eight cars require two locomotives. All Caltrain cars are bi-level, which increases seating capacity but also increases the time needed to load and off-load at stations.

When operating outside of yard limits, an operating engineer must be at the front of the train. When operating within yard limits, however, only a conductor is required at the front.

The trainman said that it takes between five and ten minutes to reverse the direction of a train. The operating engineer must relocate from the locomotive at one end of the train to the control cab at the opposite end, or visa versa. The operator is then required to test the controls before the train leaves the yard.

The time needed depends mainly on train length. At 3 mph, it takes about two minutes for an operator to walk the length of a five-car train and three minutes to walk the length of an eight-car train. The time to test the compressed air system in particular also varies according to the number of cars in the train and is roughly equal to the walking time. Thus, the five-minute turnaround time is for the shortest trains and the 10-minute time is for the longest.

HOWEVER, if a train is operating within yard limits, it can reverse direction without shifting operator location or testing the controls. A train can proceed in a reverse direction as soon as a crewman turns on the headlights at the front end. The trainman who gave me this information said he believed that stub-end tracks such as I propose — even if a mile or more in length — would qualify as within yard limits since public access is only at the boarding platforms and there are no grade crossings en route. If so, crew transfer and testing could always take place at the 4th & Townsend yards.

In the morning, operator transfer and control tests would take place at 4th & Townsend before the train leaves the yard for the journey south. There would be ample track storage space at 4th & Townsend and scheduling would not be impacted. In the afternoon, operator transfer could take place at 4th & Townsend before the train proceeds to the downtown terminus for the evening commute.

During off-peak hours, operator transfer could also take place at the downtown station by utilizing the storage/bypass tracks. Platform tracks would not be tied up, and train arrival and departure schedules would not be impacted.

In either case, the quick turnaround needed for a 2nd & Minna Station with only two platform tracks is evidently feasible.

To illustrate further, northbound trains arriving in the pusher mode during the morning commute would discharge some passengers at 4th & Townsend and then continue underground to the 2nd St. stub-end, off-load and load, and return to 4th & Townsend. At this point, reverse commuters that boarded at the downtown station would experience a delay while train crews change ends for the southbound trip. However, fully 90 per cent of reverse commuters live in parts of the City that are more accessible to 4th & Townsend than to a downtown location. These commuters will board at 4th & Townsend and would not be delayed. The evening commute would have a reverse scenario.

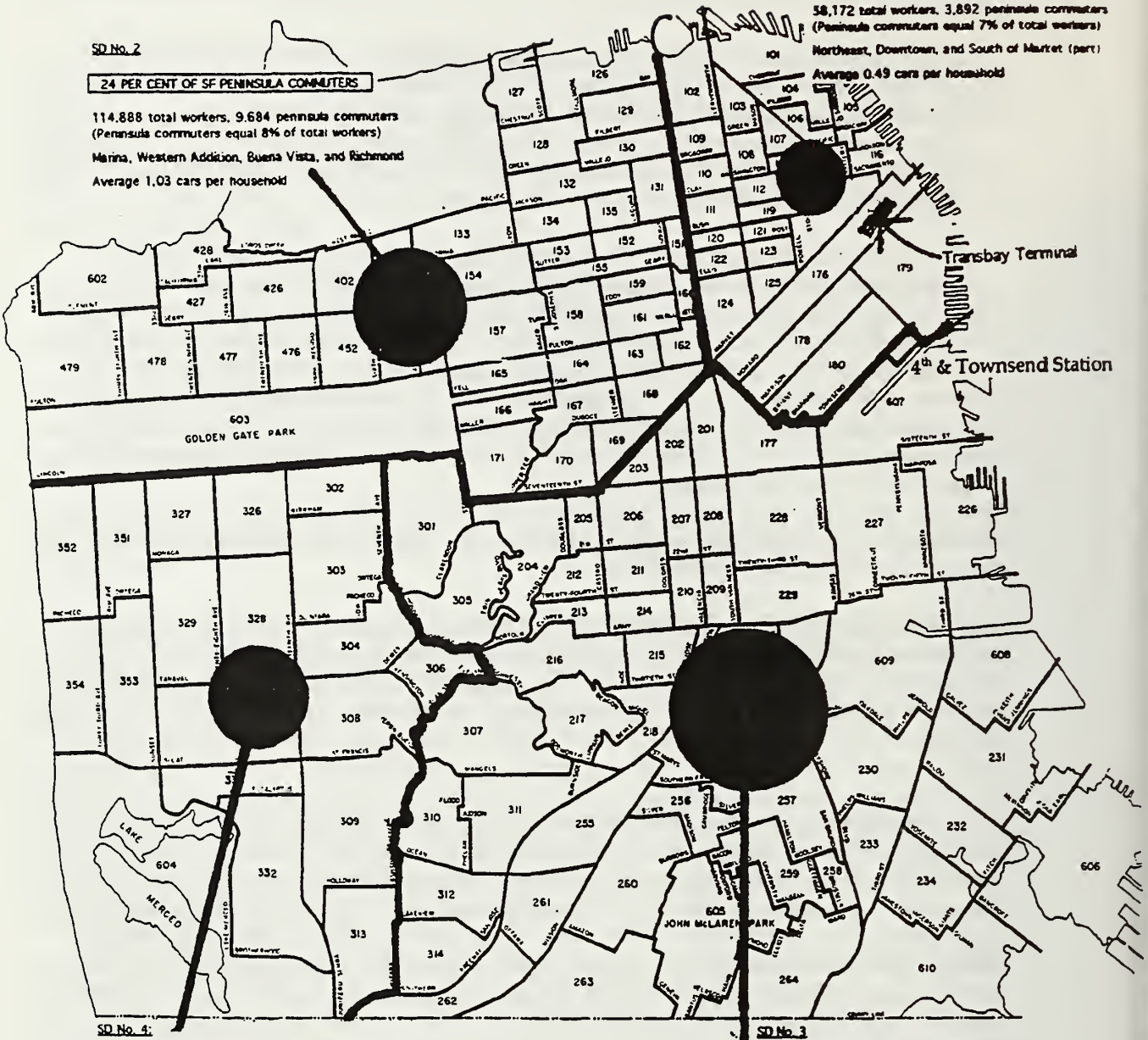
The diagram on page 3 is based on MTC data and shows the city wide reverse-commute pattern as it was in 1990.

This tilt in favor of 4th & Townsend for the reverse commuter would be further enhanced if additional short-term and long-term parking were provided at 4th & Townsend. Unlike Transbay, the 4th & Townsend site can accommodate several levels of parking conveniently located directly above train platforms. These parking spaces would unquestionably enhance ridership for both Caltrain and high-speed rail.

One other option is worth consideration. Although diesel exhaust poses an air-quality problem in downtown San Francisco, it may not be necessary to electrify the entire 77-mile Caltrain system before tracks can be extended underground to the downtown. I have been told that electric "push-pull" locomotives have been used successfully at Penn Station in NYC and elsewhere to power diesel trains for trips comparable to the round trip between 4th & Townsend and the stub-end at 2nd & Minna. Coupling and de-coupling of the electric locomotive can be accomplished quickly, and a crew shift is not required.

# # #

PENINSULA COMMUTERS - 1990



San Francisco Total

Average 1.06 cars per household

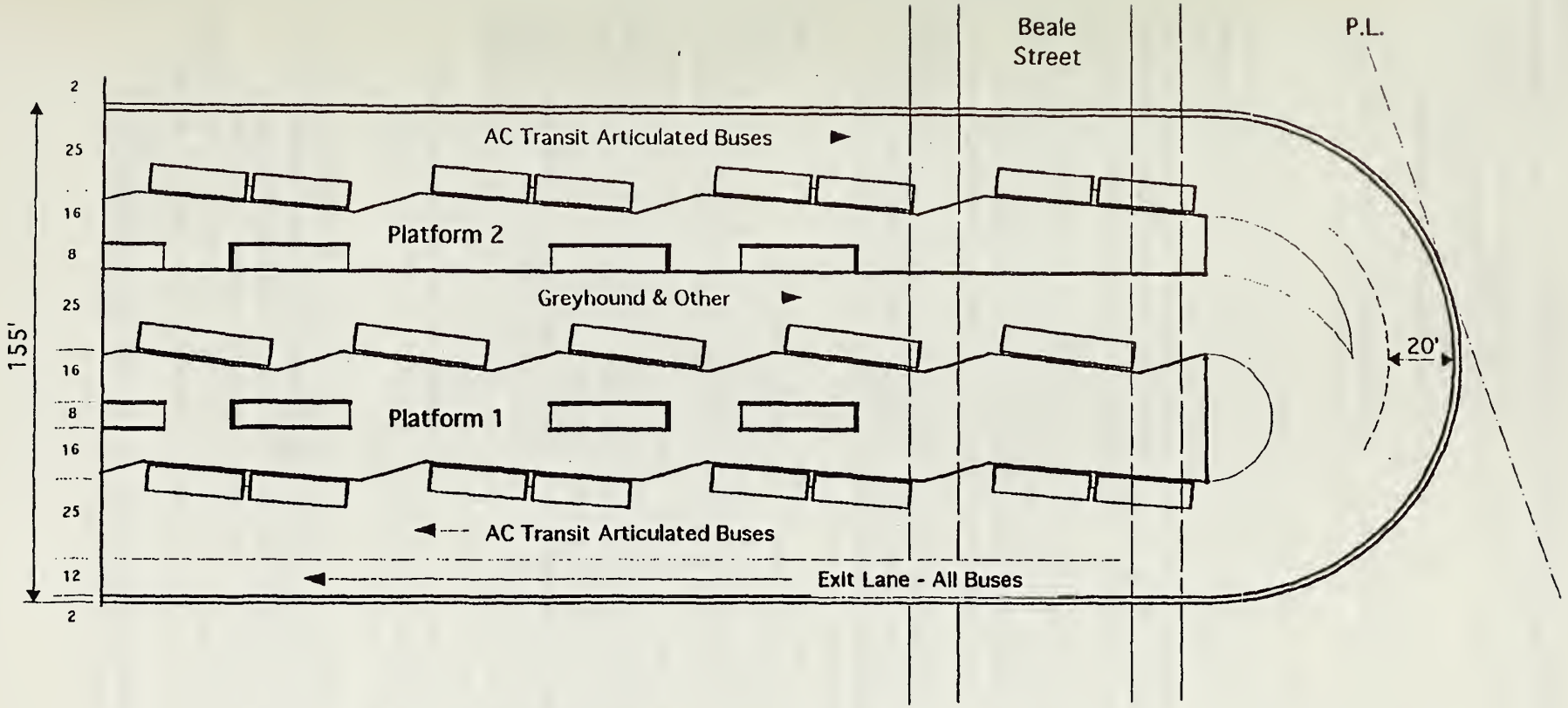
378,921 total workers, 40,440 peninsula commuters
(Peninsula commuters equal 10.7% of total workers)

Of these, only 2,236 (5.5%) commute to SD No. 9, Silicon Valley

For planning purposes, the MTC has subdivided the land area of the nine Bay Area counties into 34 "superdistricts". Four of these superdistricts are in San Francisco. This map shows the number of San Francisco residents living in each of the superdistricts whose jobs are located in the peninsula, i.e., southbound reverse commuters.
Data is from the 1990 Census.

Source: Detailed Commute Characteristics in the San Francisco Bay Area, MTC Working Paper #7, March 1994.

ATTACHMENT NO. 2
Page 3



TRANSBAY TERMINAL - SINGLE BUS LEVEL @ El. +20'
East End Only is Shown

WmB Apr 4, 2001 Scale 1" = 50' (1:600)

This drawing illustrates the feasibility of a single deck for all of the bus bays required by the BATA program. It replicates the busbays shown on the 40' and 60' levels in the current proposal.

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e-mail: wdbmlb@ix.netcom.com

November 12, 2002

Dave Mansen
Parsons Transportation Group
120 Howard Street, Suite 850
San Francisco CA 94105

Dear Dave:

Enclosed for your consideration is an updated version of the material previously sent on the Caltrain Extension Project. Please use this copy when making your review.

The EIS/EIR Notice states that reasonable alternatives will be reviewed and evaluated in the EIS/EIR. Despite Joan's explanation that the wording of the notice was misleading, it is my understanding that CEQA guidelines as well as federal statutes require an appropriate response. Otherwise, why ask for citizen participation?

EIS/EIR Figure 2.3-1, Alternatives Considered and Withdrawn, does not include my proposal. However, if it had been considered, I suppose that the objections would be similar to those given on page 2-50 for the Essex Street stub-end alignment that you pointed out after the SPUR meeting.

In response to those particular objections, I note the following:

Although the train platform is not directly under the terminal building, it is nonetheless an integral part of the multi-modal transit facilty. Passenger circulation by means of moving walkway and ease of transfer from one mode to another are probably the most attractive features of my plan. Caltrain commuters have direct links not only to the bus terminal but also to BART/MUNI Metro at Montgomery Street, a connection that is not even in the consultant's plan. Transfer between AC Transit, Caltrain, and BART is frictionless. Greyhound passengers or BART SFO passengers transferring with luggage have a virtually effortless transfer via the moving sidewalks. Train levels are 25 feet below the surface rather than 50 feet. The plan has one bus level at the terminal that is 20 feet above the street, not two levels that are 40 and 60 feet above the street. Escalator travel is reduced by 50 per cent or more. Transfer to street level taxis, buses, limousines, and private cars right at the front door of the bus terminal is a major improvement that is also not in the consultant's plan.

The orientation of my plan does not allow for trains to pass through the station to a storage track. Instead, three storage/by-pass tracks are provided at the station that are equally accessible to the two platform tracks. One train does not block another. Caltrain at present operates with 12 stub-end platform tracks without "tail" tracks. These yards are within two minutes of the stub-end and would be retained in my plan. They would be underground on one level, however, as would all tracks at 4th & King.

My research shows that train direction can be reversed without reducing operating efficiency. See the enclosed "Notes."

On other items, Joan Kugler insisted that an underground connection to BART is in the TBT project. It is not in the cost estimate, however, and otherwise ignored in the EIS/EIR. I think the underground concourses with moving walkways connecting BART, Caltrain, and TBT are the links that make a multi-modal facility.

I am also bothered about developing a very costly terminal design that accommodates HST without at the same time showing how it is possible for HST to enter San Francisco. I recall that Maria Ayerdi was adamant that Proposition H includes HST. As you noted, the grade crossing at 16th St. prohibits HST.

I found on page 2-24 the sewage treatment plant and underground collector pipe you mentioned, and now understand why the track slope begins where it does. I assumed that tracks would come in underground beginning at the tunnel entry near 23rd St., 16th St. would remain open, and the entire Caltrain yards at 4th & King would be one level below grade, an arrangement ideal for a fine terminal at street level. The 4th & King site with a spur connection to TBT has the potential for a great station, with the downtown multi-modal commuter transit complex as an indispensable adjunct. From the 4th & King site, a new transbay tube could eventually provide straightforward continuation for HST to Sacramento and a second East Bay commuter rail line.

Even without HST, the 16th Street grade crossing is a problem. I put a stopwatch on the train crossings one morning. If the increase in peak hour trains is in proportion to the projected increase in Caltrain ridership, the railroad crossing gates at 16th Street will block cross traffic about 60 per cent of the time! How would motorists accept that?

SB 1856 does specify the Transbay Terminal as the ultimate destination for HST but, according to Rod Diridon, the $9 billion bond issue is only enough for the LA to San Jose portion. In spite of the commitment to downtown San Francisco, Section 1 (e) allows the Authority to set the limits of the route without extending to San Francisco. Diridon said that an additional $2 billion is needed to bring HST up the peninsula. Incidentally, I noticed Caltrain electrification is funded only to 4th & King.

Although less grandiose than the proposed, my alternative plan for Caltrain extension is an economical approach that is worthy of consideration. If the terminal design follows consistently, it would have only three levels rather that the proposed 5-1/2 levels and its cost would come down proportionately. This plan clearly benefits the commuter—thereby encouraging transit use—meets all of the requirements of Proposition H, and provides a level of rail service that is more than adequate for the foreseeable future.

I look forward to your comments.

Sincerely,

William Blackwell

William Blackwell

Copy: Maria Ayerdi
Joan Kugler
Darrel Maxey
Jim Chappell, SPUR

SPUR, Friday Nov 8, 2002

My question is for Mrs. Kugler.

Eighteen months ago, after the EIS/EIR kick-off meeting at City Hall, I sent written comments to you that included an alternative plan for the extension of Caltrain.

This plan enhances connectivity and reduces cost without detracting from the concept of a major multi-modal transit facility in the heart of downtown San Francisco.

There may even be a precedent at Pennsylvania Station in NYC for the operating scenario that I propose, which, at the least, demonstrates that the concept is feasible.

The official EIR notice said that "any ... reasonable alternatives that emerge" would be reviewed and evaluated in the EIS/EIR. In fact, I have been told that this is a legal requirement.

Hence, my question has two parts:

Why wasn't my alternative reviewed and evaluated in this draft?

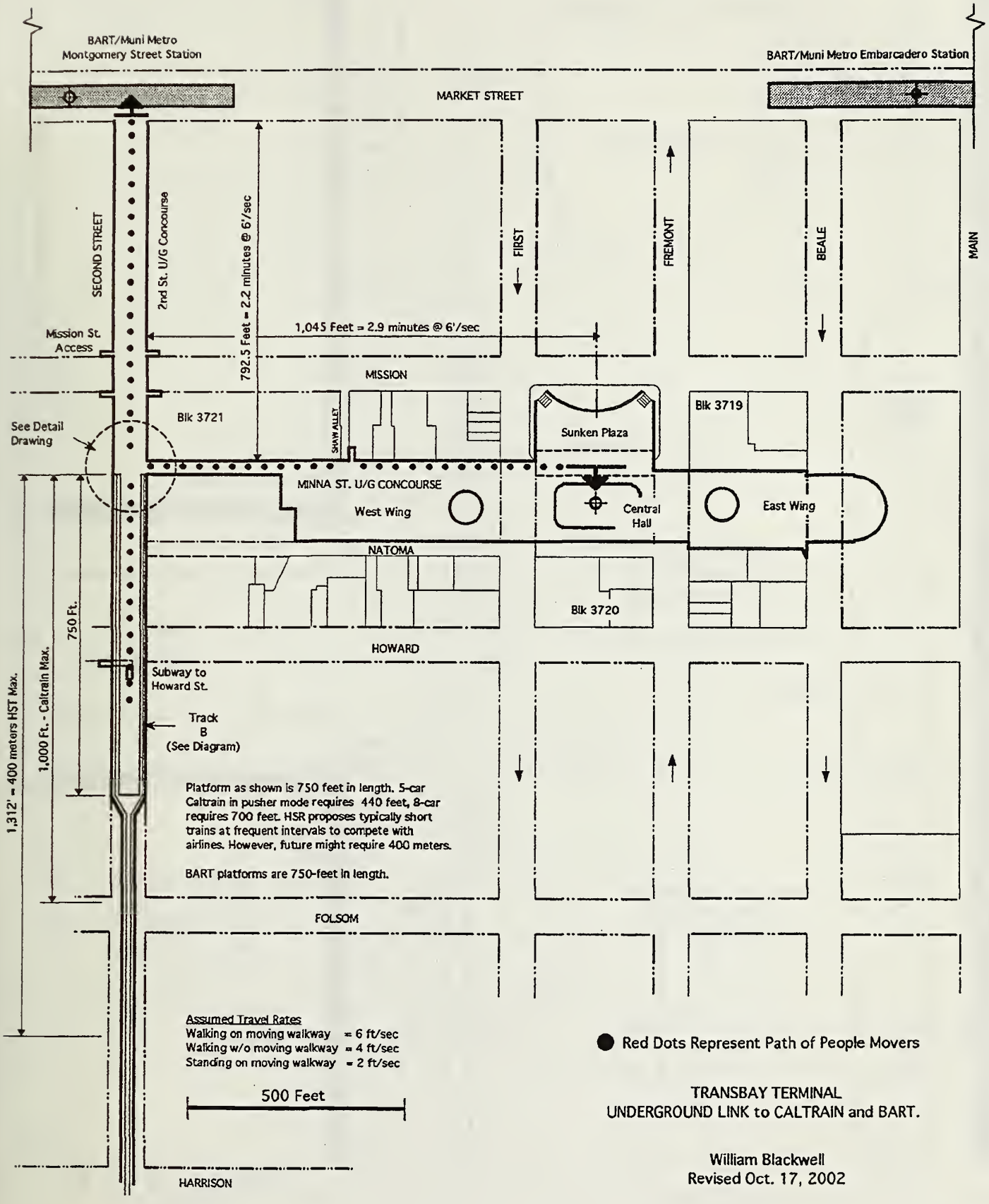
What expectation do I have that it will be properly reviewed and evaluated from this point forward?

MAR 16 2001

NOTICE OF PREPARATION/NOTICE THAT AN EIR IS REQUIRED
San Francisco Transbay Terminal / Caltrain Downtown Extension Project
Environmental Impact Statement/Environmental Impact Report (EIS/EIR)

The Project and Project Alternatives

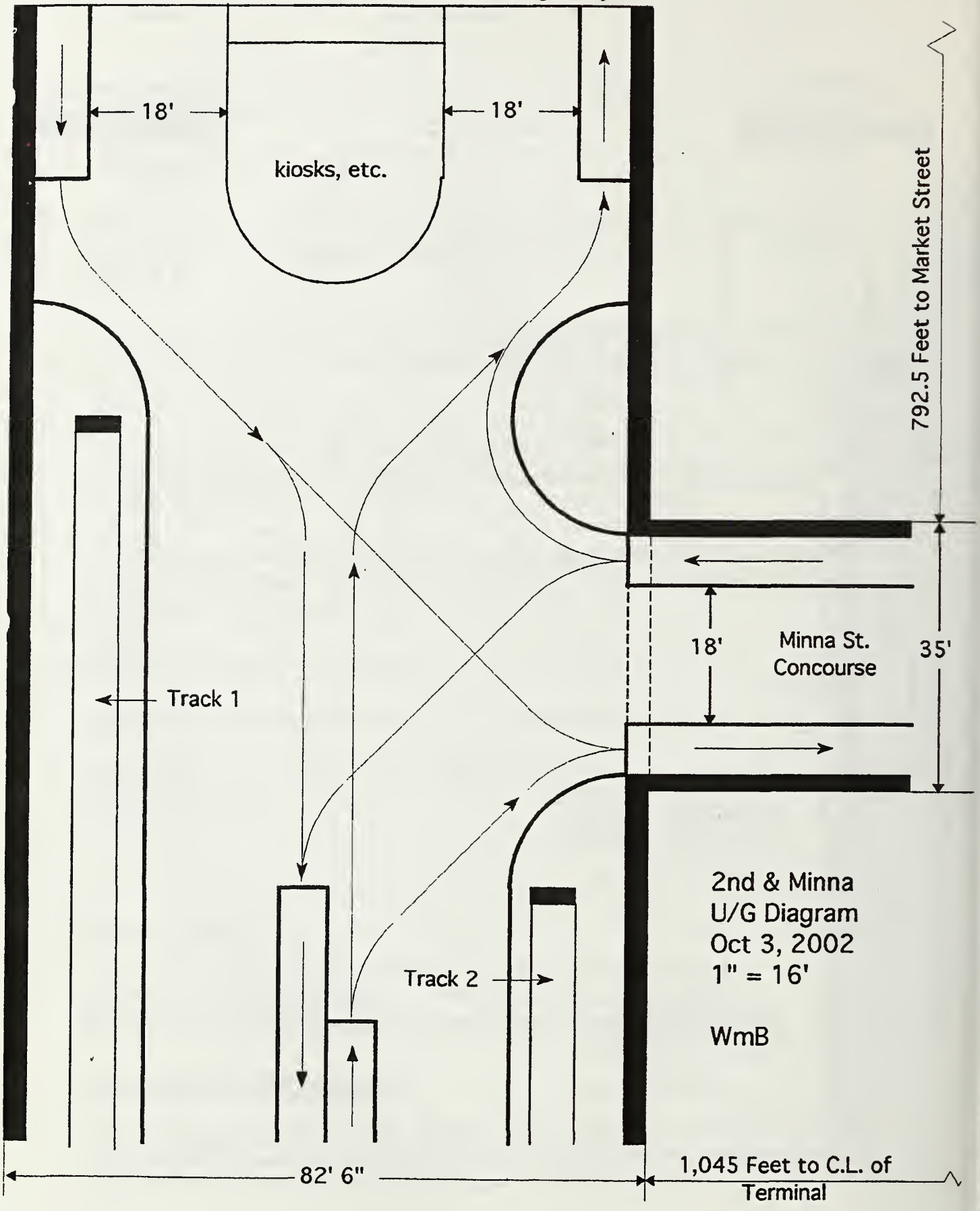
Alternatives to be reviewed in the EIS/EIR include a No-Project Alternative, a Build Alternative, and any additional reasonable alternatives that emerge from the scoping process. Variations and design options of the Build Alternative will be evaluated.

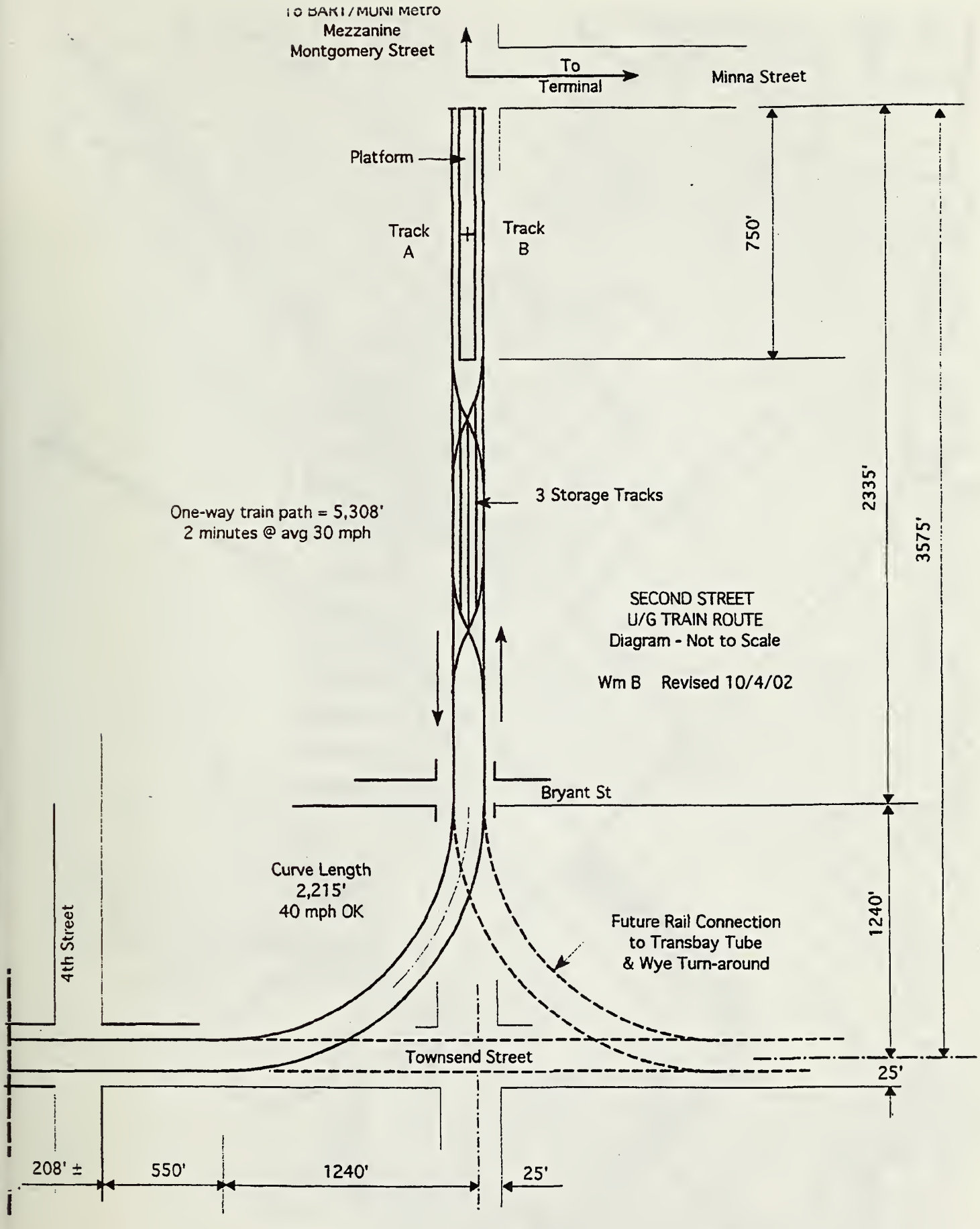


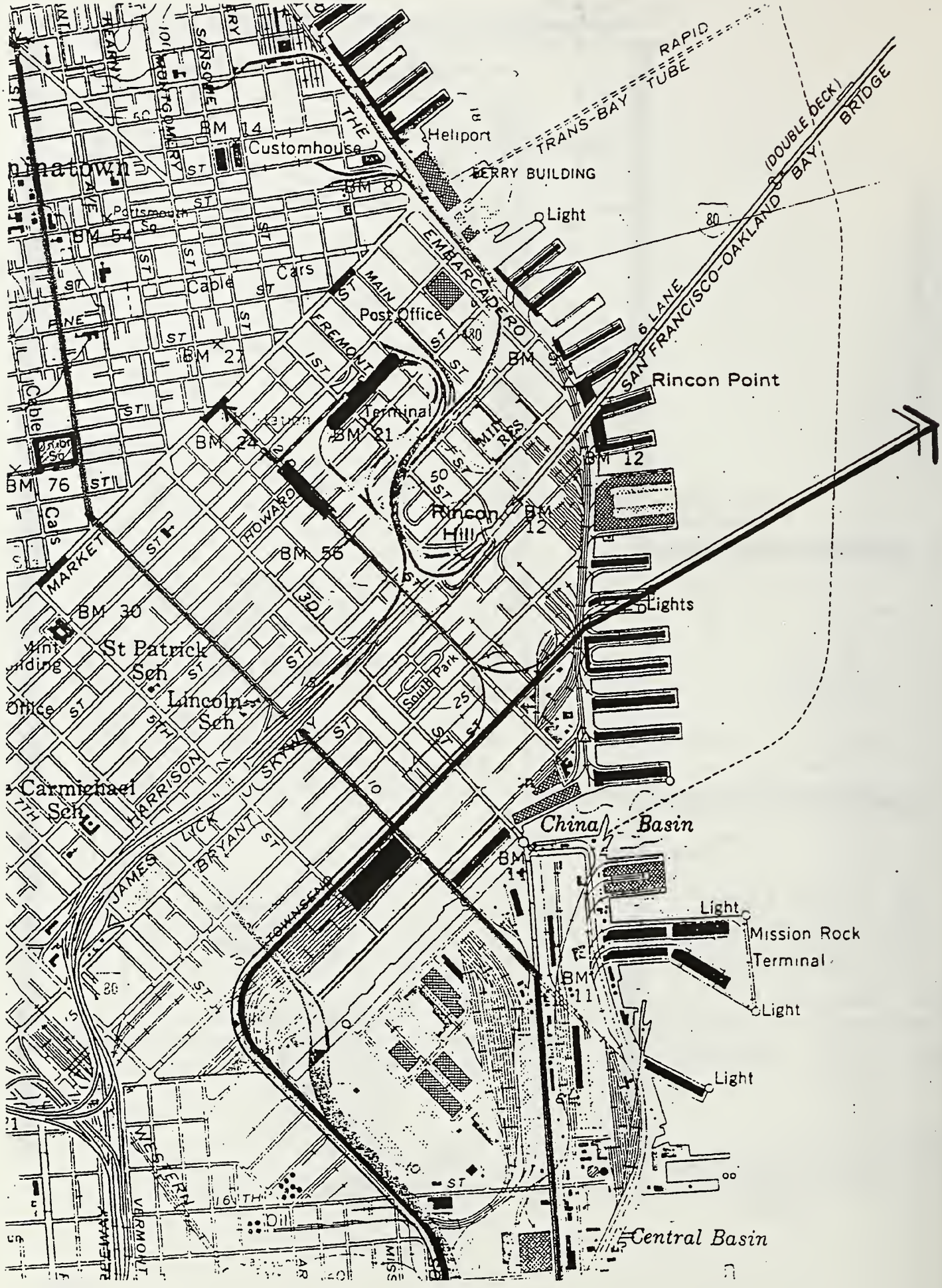
TRANSBAY TERMINAL
UNDERGROUND LINK to CALTRAIN and BART.

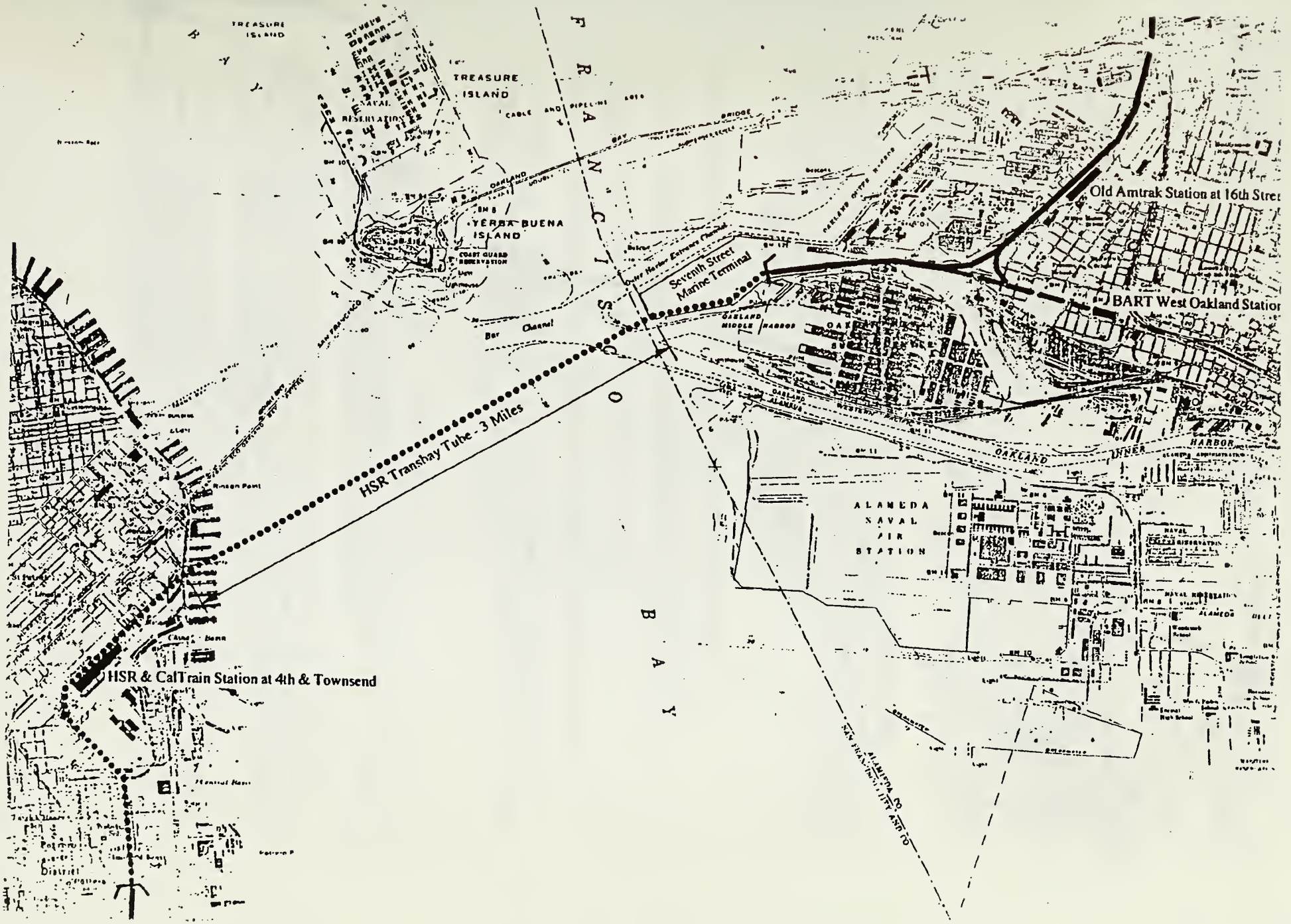
William Blackwell
Revised Oct. 17, 2002

2nd St Concourse to BART/MUNI Mezzanine at Montgomery St.




To BART / MUNI Metro
Mezzanine
Montgomery Street
To
Terminal
Minna Street
Platform
Track
A
Track
B
750'
2335'
3575'
3 Storage Tracks
One-way train path = 5,308'
2 minutes @ avg 30 mph
SECOND STREET
U/G TRAIN ROUTE
Diagram - Not to Scale
Wm B Revised 10/4/02
Bryant St
Curve Length
2,215'
40 mph OK
1240'
Future Rail Connection
to Transbay Tube
& Wye Turn-around
4th Street
Townsend Street
25'
208' ±
550'
1240'
25'


RAPID
TRANS-BAY TUBE
(DOUBLE DECK)
SAN FRANCISCO-OAKLAND BAY BRIDGE
6 LANE
Heliport
FERRY BUILDING
Light
Customhouse
BM 14
BM 8
Portsmouth Sq
BM 54
Cable Cars
EMBARCADERO
MAIN
Post Office
FREMONT
BM 27
Rincon Point
Terminal
BM 21
BM 24
BM 12
BM 76
Rincon Hill
HOWARD
BM 56
MARKET
BM 30
Lights
St Patrick Sch
Lincoln Sch
South Park
Carmichael Sch
HARRISON
JAMES LICK SKYWAY
BRYANT
TOWNSEND
China Basin
Light
Mission Rock Terminal
BM 11
Light
Light
Central Basin
WESTERN
VERMONT
16TH
Oil


TREASURE ISLAND
YERBA BUENA ISLAND
SAN FRANCISCO BAY
Seventh Street Marine Terminal
Old Amtrak Station at 16th Stree
BART West Oakland Station
HSR Transbay Tube - 3 Miles
HSR & CalTrain Station at 4th & Townsend
ALAMEDA NAVAL AIR STATION
OAKLAND INNER HARBOR

SACRAMENTO
Capitol Corridor
Fairfield
SAN FRANCISCO
OAKLAND
SFO
Tracy
Stockton
Pleasanton
Modesto
Newark
Redwood City
SAN JOSE
Merced
120 mph
Gilroy
Los Banos
Fresno
Monterey
Panoche Pass
Visalia
220 mph
RECOMMENDED ROUTE (1996)
I-5 CORRIDOR
Bakersfield
Palmdale Detour
Grapevine
Palmdale
Santa Clarita
Burbank
LOS ANGELES
Ontario Airport
Riverside
Anaheim
Irvine
Oceanside
SAN DIEGO
Miles
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16
32
N

MAP NO. 1

SUMMARY

The Transbay Terminal plan approved by the Executive Committee of the Transbay Panel includes an underground six-track, three-platform rail terminal 50 feet below the surface for Caltrain and high-speed rail. Trains enter and leave by way of a two-track tunnel from 4th & King that proceeds north under Second Street and then makes a wide radius turn into an underground train box. Tail tracks may be added beyond the terminal to store and stage trains. Until the time when tracks are extended to a new transbay tube, all of these tracks are stub-end tracks. An option is included for possible future pedestrian connection to the BART/Muni Metro Embarcadero Station, but no funding is provided for this option.

A two-track, one-platform rail terminus at Second and Minna is an alternative arrangement that enhances connectivity and reduces cost. Horizontal passenger conveyors (people movers) link the train platform to the Transbay Terminal and to the BART/Muni Metro Montgomery Street Station. From the point of view of a transit user, it is a very efficient arrangement. It also simplifies construction.

MAJOR ADVANTAGES

- Enhances connectivity between Caltrain and other major transit systems.
- Reduces travel time and adds convenience for both bus and train riders.
- Reduces the combined cost of TBT and Caltrain extension.
- Meets the requirements of San Francisco Proposition H. The present plan does not.
- Allows Caltrain extension to proceed independently of TBT, which has several problems that could delay construction, possibly for years; conversely, allows TBT to be constructed without waiting for Caltrain Extension.

DISCUSSION

1. Does a two-track platform on Second Street have enough capacity for the level of train service contemplated, now and in the foreseeable future?

The Second Street R.O.W. can accommodate two stub-end tracks and a very wide passenger platform. There is ample room for horizontal passenger conveyors down the center of the platform that will effectively reduce walking time. There are no existing underground utilities under Second Street that restrict construction.

With an average dwell time of two minutes—the time allotted for high-speed rail stops at intermediate stations—and another 60 seconds for trains to enter and leave the station, two stub-end platform tracks can accommodate 40 trains per hour. Keep in mind that trains now travel backwards as easily as forward.

Caltrain:

According to the timetable effective August 26, 2002, Caltrain runs 76 trains in and out at Fourth & King every weekday, but never more than eight per hour even at the height of the morning commute. A platform with a capacity for 40 trains per hour can accommodate five times this current peak.

Moreover, at present Caltrain commuter trains are only five cars in length. A 750-foot long platform at the downtown extension can easily accommodate eight car trains. With eight-car trains, a two-track platform has a capacity that is eight times the current peak hour Caltrain activity!

In addition to two mainline tracks, Second Street is wide enough for three storage/by-pass tracks that provide operational flexibility at the stub-end. The concept retains intact (although underground) 12 to 15 tracks at 4th & King for train storage, staging, and light servicing that are within two minutes of the stub-end. Pennsylvania Station in NYC has operated for 50 years or more with storage yards that are remote but within two minutes. Caltrain, of course, has stub-end platform tracks at 4th & King. Tailing tracks are not provided.

High-speed Rail:

Unless 16th Street is closed to cross traffic, which seems unlikely because of its importance to Mission Bay, or the tracks are under grounded before reaching 16th Street, there can be no high-speed rail service to San Francisco.

> The final report of the Intercity High-Speed Rail Commission, December 1966, said that "to attain the safety record of high-speed trains in other countries, California's system must be entirely fenced and grade separated (no rail/roadway intersections)." The June 2000 final business plan of the California High-Speed Rail Authority said, "The system will be completely grade separated, with no potential for conflict with pedestrian or vehicular traffic."

Assuming, however, that the 16th Street grade crossing problem is resolved, the timetable for high-speed rail in the year 2020 shows 132 trains per day in and out of San Francisco – but never more than 10 trains per hour. Thirty-six of the 132 daily trains are between San Francsico and Sacramento. The HST peak period does not correspond to the Caltrain peak period.

Ten trains per hour might well be on the high side. Dan Leavitt, Deputy Director of the High Speed Rail Authority, said that because of traffic and other concerns, only express trains might continue to the Transbay Terminal, the remainder terminating at Fourth & King. Alternatively, some trains slated for San Francisco might be routed from San Jose up the East Bay side to Oakland and eventually to Sacramento by an improved Capital Corridor route. As it stands, it is cheaper and faster to go by car (88 miles) than to make the 282-mile trip to Sacramento via high-speed train. Greyhound bus from San Francisco to Sacramento beats the time of local high-speed trains and at one-third the fare.

Conclusion

Two platform tracks with a capacity of 40 trains per hour permits a five-fold increase in Caltrain peak-hour service and has ample track capacity for high-speed rail well beyond the year 2020.

Moreover, reductions in dwell time could increase the capacity of a two-track platform from 40 up to 60 trains per hour. Caltrain dwell time at intermediate stations is currently less then 2 minutes but BART dwell time is less then 30 seconds! This is because there are no steps to impede passenger flow - BART cars have only one level and station platforms are at the height of the car floors – and because several sets of entrance and exits doors are provided in each car.

The inescapable conclusion is that the rail plan developed by MTC consultants is more elaborate then needed to meet present and future downtown rail requirements.

Adding more platform tracks does allow longer dwell times but does not increase the maximum throughput of a station. No matter how many platform tracks are provided, the maximum number of trains per hour in and out of any downtown terminal arrangement will be governed by the maximum feasible in a two-track tunnel, never likely to exceed 60 trains per hour with current technology.

The consultant's report said that the rebuilt Transbay Terminal would have the capacity for 300,000 train/bus passengers. This is four times the number of trains and buses projected for the year 2020, and, thus, questionable. The number of bus bays cannot be quadrupled nor can the number of train platform tracks. But even if the terminal had the capacity for this number of train platforms and bus bays, there is not enough land available anywhere near the terminal site for the 45 million square feet or so of additional downtown office space needed for this number of new commuters. The whole of the financial district has only 44 million square feet of office space.

2. BART/Muni Metro Connection

Proposition H requires the terminal design to "yield the highest possible transit use by residents and commuters." It also requires that the terminal design "afford senior citizens, persons with disabilities, and other commuters with the most convenient connections between regional bus lines, MUNI, Caltrain, and BART."

The most convenient connection from TBT to BART/Muni Metro is an underground concourse with moving sidewalk to the Montgomery Street Station, a trip that will take the average commuter slightly over five minutes on the people mover. The same trip over surface sidewalks and three street crossings takes from 7.5 to 9 minutes – longer for persons slowed by luggage, small children, age, disability, or inclement weather.

If Caltrain terminates more or less at the mid-point of this underground connector, commuter trains will be most conveniently located for passengers going either to the financial district or to the terminal. It will take just over 2 minutes to go from the train

platform to the BART /Muni mezzanine level at Second & Market, and about 3 minutes to reach the center of the Transbay Terminal.

Commuters are almost always in a hurry. Even on a perfect weather day, many will choose the underground concourse because it saves time.

High-speed rail passengers and BART SFO passengers with luggage will most assuredly prefer a people mover to interconnect between TBT buses, BART/MUNI, HSR, and Caltrain.

Although the Embarcadero BART/Muni Metro Station is closer to the Transbay Terminal and Ferry Building, the Montgomery Street Station at 2nd & Market is closer to the heart of the financial district, which has two-thirds of all office space in San Francisco. In fact, early studies for Caltrain extension scored location options based on relative proximity to 2nd & Market. Moreover, the underground route from the TBT to Montgomery Station is ideal for connecting with Caltrain on Second Street.

Morning BART trains from the East Bay discharge riders at both Embarcadero and Montgomery Stations, which means there will be at least standing room for westbound passengers to board at Montgomery Station. Because it is near the end of the line, Muni-Metro will also have room for passengers in both directions.

The underground concourses, incidentally, can be a lively feature of the terminal. It naturally follows that some retail shopping and restaurants would be at this level with "breakthroughs" to the street level. Critics have described the underground 'satellite' restaurants as the most successful feature of the recent remodeling of Grand Central Station in New York City.

3. COST

Prop H requires the design to "result in the lowest feasible combined costs for construction of the bus terminal and the Caltrain station, without sacrificing the aesthetic qualities of the terminal and station and their interface with surrounding development."

If otherwise feasible, ending the Caltrain portion at 2nd & Minna results in a lower combined cost than the proposed design. There are some trade-offs, but the shorter rail route is also shallower, deletes one curve under buildings, can be constructed in part with cut and cover, deletes the huge excavation and shell needed for the trainbox under the terminal, and deletes the tail tracks.

Moreover, if the terminal design were revised consistent with the underground concourse concept I propose it would have only three levels rather than the proposed 5 1/2 levels and its staggering one billion-dollar cost would come down roughly in proportion.

An underground concourse with horizontal passenger conveyors to BART/Muni Metro is not included in the TBT plan, although I think it is clearly mandated by Prop H. If this feature had been included, added cost due to the conveyors would be nil.

The 2nd St rail concept is entirely underground and can have no possible adverse effect on aesthetic quality. In theory, the current TBT design could remain unchanged, except, of course, the underground trainbox would be deleted.

The larger issue is the very low cost/benefit ratio of the Caltrain Extension Project when compared with other transportation projects. See the attached table.

Cost of the extension project is now $849 million — $450 million per mile! Electrification of Caltrain at $602 million and Phase 1 of the Caltrain Express Project (Baby Bullet) at $127 million are separate and additional JPB projects.

The Caltrain ridership forecast in the Draft EIS/EIR is 29,307 train riders at the Transbay Terminal in the year 2020. This number equates to roughly 15,000 commuters who will benefit.

Caltrain extension, incidentally, is not dependent on electrification of the entire Caltrain system, a project that might best be delayed until it can be done jointly with high-speed rail. For air quality reasons, New York City prohibited first steam, and then diesel powered locomotives within the city. Until the time when all commuter rail systems converted to electric, Penn Station successfully employed supplemental electric locomotives to move trains underground in and out of the City.

A related consideration is BART extension to SFO, that when open will enable Caltrain passengers to transfer to BART at Millbrae and reach downtown destinations near any of the four BART station locations on Market Street. One Caltrain/BART platform at the new Millbrae Station will provide for cross-platform transfers.

The fare from Millbrae to Montgomery Street Station on BART will be $4.70, whereas remaining on Caltrain to 4th & King adds only $0.75 to the fare. The trip on BART will take 32 minutes plus the time to transfer. BART makes 11 intermediate stops. The trip on Caltrain from Millbrae to the 4th & King station takes 29 minutes with 5 intermediate stops. A timetable and fare schedule has not yet been published for the Caltrain Baby Bullet.

4. Supplemental Notes

a) It seems likely that, for the foreseeable future, the northern terminus of the California high-speed rail system will be at the San Jose Diridon Station rather than at a station in San Francisco. Senate Bill 1856, authorizes a $9 billion general obligation bond for the November 2004 ballot, which is enough to construct high-speed rail from LA to San Jose (by way of Fresno and Los Banos) but not enough to continue HSR to San Francisco. Rod Diridon said an additional $2 billion is needed to reach San Francisco. For an interim period, San Francisco bound HSR passengers will transfer to the Caltrain "Baby Bullet" at San Jose, which puts added importance on the extension of Caltrain to the

downtown financial district of San Francisco. The Baby Bullet trip from San Jose to 4th & King is expected to take 55 minutes or less.

Without the possibility of a new transbay tube, San Jose has a strategic advantage over San Francisco for the location of the high-speed rail terminus that may be difficult for San Francisco to overcome.

b) Even with a downtown extension, Caltrain plans to retain a station stop at 4th & King. Moreover, the 4th & King site has major advantages for high-speed rail—notably more space, better traffic access, lower cost, and reduced travel time. Unlike Caltrain, HSR has space requirements for ancillary activities such as postal and freight, car rental, passengers with luggage requiring auto and taxi service, etc. Although controversial, the provision of long- and short-term parking would be a major enhancement for both HST in competition with air travel and for Caltrain reverse commuters. San Jose and Oakland airports each provide about 5,000 parking spaces for air travelers. A like number can be provided at 4th & King but is probably impossible to provide at the Transbay Terminal site, even if desirable.

The City of San Francisco has an opportunity for two great facilities — a grand train station with all the amenities at 4th & King supplemented by a downtown multi-modal facility providing commuters with unparalleled public transit convenience.

c) Financing: In 1999 the City Controller's statement on Proposition H said that "as a member of the Joint Powers Board, the City of San Francisco would be responsible for one third of the cost of capital improvements." At that time, the cost of the capital improvements was $621 million for the extension and $254 million for Caltrain electrification. The cost of rebuilding the Transbay Terminal was not included.

These costs are now at $849 million and $602 million respectably. In other words, San Francisco's obligation under Proposition H has increased from $292 million to $484 million in just three years. The Controller assumed that this funding would be by state and federal governments and by regional transportation agencies, and not from General Fund monies. However, the Controller said that the Caltrain Extension Project "would compete with other transportation projects and funding this project may mean that other transportation projects important to the City would not be funded." Thus, there is added incentive to see that San Francisco gets full value for the money spent on this important project.

PROJECT COST vs. NUMBER OF DAILY USERS

Note	Project	Approx. Cost (millions)	Number of daily users*	Cost per Daily User	Multiple to equal TBT
a	TRANSBAY TERMINAL, bus only	$ 1,052	20,000	$ 52,600	0.0
b	Transbay Terminal, bus + train	$ 1,885	40,000	$ 47,125	1.1
c	BART Extension to SFO	$ 1,500	46,600	$ 32,189	1.6
d	SFO New International Terminal	$ 840	32,877	$ 25,550	2.1
e	Bay Bridge - East Span	$ 2,620	228,500	$ 11,466	4.6
f	Pacific Bell Park	$ 300	42,000	$ 7,143	7.4
g	Penn Station Remodel	$ 800	250,000	$ 3,200	16.4
h	Grand Central Station Remodel	$ 391	250,000	$ 1,564	33.6

NOTES:

a Total project development cost dated 1/26/01 is $1,052,302,227; includes temporary facilities. MTC year 2020 daily bus ridership is 35,000 – equates to about 20,000 daily commuters*

b Cost is Caltrain extension and rebuilt Transbay Terminal as of Dec 19, 2001 (MTC Draft RTEP). Year 2020 daily transit ridership for bus and train is given as 75,000 (MTC brochure Jan 2001) which equates to roughly 40,000 daily commuters. Caltrain electrification ($600 million) is not included.

c $1.5B cost and ridership of 68,000 per day, Vicky Wills BART PIO 3/14/01; assume 25,200 are air passengers and remainder are daily commuters, total user per day = 46,600.

d SFO Fact Sheet 7/2000, 12 million international passengers in year 2006 = 32,877 per day

e 282,000 vehicles per day (Year 2000) at avg. 1.62 persons per vehicle (Caltrans 1991); divided by 2 = approx. 228,500 commuters; cost of $2.62 B as of April 5, 2001.

f Cost and number of seats 1/24/99 - SF Examiner

g NY Times, 12/10/2000 - 300,000 train + 200,000 subway passengers = 250,000 commuters Only 7.4% are Amtrak, others are commute lines. 750 trains per day, 21 platform tracks.

h NY Times, 8/2/1998 - Cost includes $110 million for network of u/g passageways 550 trains per day on 45 platform tracks.

* For weekday commuter systems such as Caltrain, riders per day divided by two equals approx. number of daily commuters. In the case of AC Transit, however, car-pooling in the a.m. changes number of daily users to about 60% of total AC Transit cross-bay ridership. AC Transit accounts for about two-thirds of total daily bus ridership. Hence, estimate of 20,000 commuters for bus-only terminal with 35,000 riders per day, and 40,000 commuters for terminal with Caltrain extension (75,000 riders per day).

SECTION 2. As part of the extension of Caltrain downtown, a new or rebuilt terminal shall be constructed on the present site of the Transbay Transit Terminal serving Caltrain, regional ~~and~~ intercity bus lines, MUNI, and high speed rail, and having a convenient connection to BART and MUNI Metro. Said terminal shall be so designed and constructed as to: (a) yield the highest possible transit use by residents and commuters; (b) afford senior citizens, persons with disabilities, and other commuters with the most convenient connections between regional bus lines, MUNI, Caltrain, and BART; (c) produce the highest density of foot traffic, in conjunction with foot traffic from the Caltrain station, to accommodate mixed use retail development; (d) provide the lowest possible operating costs for MUNI and regional public bus lines; and (e) result in the lowest feasible combined costs for construction of the bus terminal and the Caltrain station, without sacrificing the aesthetic qualities of the terminal and station and their interface with surrounding development.

Notes after 8/15/02 visit to the 4th & King Caltrain Depot:

The success of my proposal to extend Caltrain to 2nd & Minna, where there is room for only two platform tracks, depends on short turnaround times. If short turnaround times are feasible, a two-track station may be all that is needed for the level of downtown service contemplated by both Caltrain and the California High-Speed Rail System.

According to trainmen at 4th & King, northbound Caltrains are typically in the "pusher" mode, i.e., with the locomotive at the rear and the operating engineer in a cab car at the front. Commuter trains have five cars and are just less than 500 feet in length including the locomotive. Special event trains are longer. At present, trains with more than eight cars require two locomotives. All Caltrain cars are bi-level, which increases seating capacity but also increases the time needed to load and off-load at stations.

When operating outside of yard limits, an operating engineer must be at the front of the train. When operating within yard limits, however, only a conductor is required at the front.

The trainman said that it takes between five and ten minutes to reverse the direction of a train. The operating engineer must relocate from the locomotive at one end of the train to the control cab at the opposite end, or visa versa. The operator is then required to test the controls before the train leaves the yard.

The time needed chiefly depends on train length. At 3 mph, it takes about two minutes for the operator to walk the length of a five-car train and 3 minutes to walk the length of an eight-car train. The time to test the compressed air system in particular also varies according to the number of cars in the train and is roughly equal to the walking time. Thus, the five-minute turnaround time is for the shortest trains and the 10-minute time is for the longest.

HOWEVER, if a train is operating within yard limits, it can reverse direction without shifting crews or testing the controls. A conductor simply turns on the headlights and the train can reverse direction. The trainman who gave me this information said he believed that stub-end tracks such as I propose — even if a mile or more in length — would qualify as within yard limits since public access is only at the platforms and there are no grade crossings en route. If so, crew transfer and testing could always take place at the 4th & King yards.

In the morning, operator transfer and control tests would take place at 4th & King before the train leaves the yard for the journey south, but there is plenty of track storage space at 4th & King and scheduling would not be impacted. In the afternoon, operator transfer could take place at 4th & King before the train proceeds to the downtown station for the evening commute.

Alternatively, operator transfer can take place at the stub end station by utilizing the storage/bypass tracks. Platform tracks would not be tied up, and train arrival and departure schedules would not be impacted.

In either case, the quick turnaround needed for a 2nd & Minna Station with only two platform tracks is evidently feasible.

To illustrate further, northbound trains arriving in the pusher mode during the morning commute would discharge some passengers at 4th & King and then continue underground to the 2nd St. stub-end, off-load and load, and return to 4th & King. At this point, reverse commuters that boarded at the downtown station would experience a delay while train crews change ends for the southbound trip. However, fully 90 per cent of reverse commuters live in parts of the City that are more accessible to 4th & King than to a downtown location. These commuters will board at 4th & King and would not be delayed. The evening commute would have a reverse scenario.

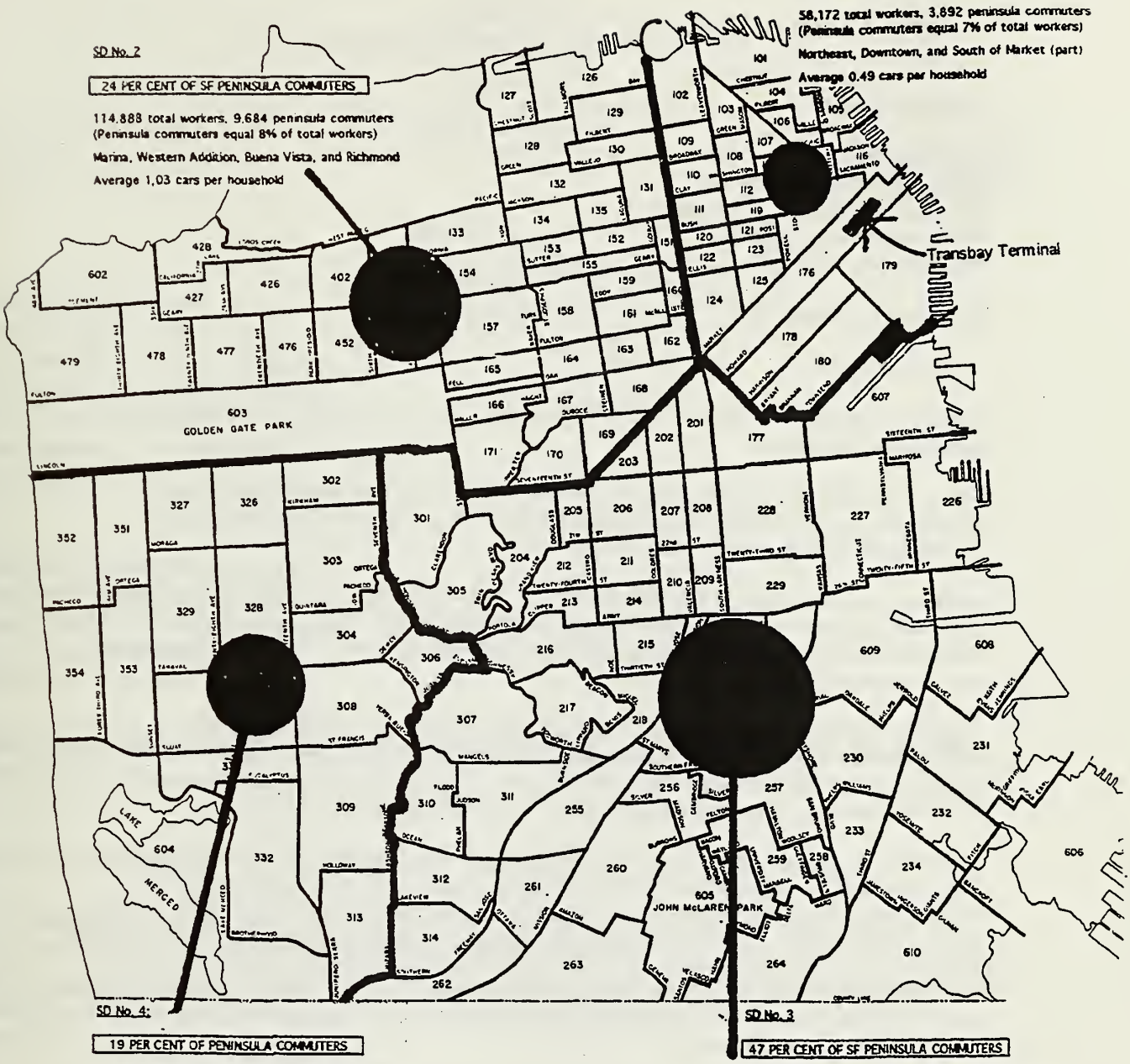
The attached diagram based on MTC data shows the city wide reverse-commute pattern as it was in 1990.

This tilt in favor of 4th & King for the reverse commuter would be further enhanced if additional short-term and long-term parking were provided. Unlike Transbay, the 4th & King site can accommodate several levels of parking conveniently located above train platforms. These spaces would unquestionably enhance ridership for both Caltrain and high-speed rail.

One other option is worth consideration. Although diesel exhaust poses an air-quality problem in downtown San Francisco, it may not be necessary to electrify the entire 77-mile Caltrain system before tracks can be extended underground to the downtown. Electric "push-pull" locomotives have been used successfully at Penn Station in NYC and elsewhere to power diesel trains for trips comparable to the round trip between 4th & King and the stub-end at 2nd & Minna. Coupling and de-coupling of the electric locomotive is accomplished quickly, and a crew shift is not required.

# # #

PENINSULA COMMUTERS - 1990



San Francisco Total

Average 1.06 cars per household

378,921 total workers, 40,440 peninsula commuters
(Peninsula commuters equal 10.7% of total workers)

Of these, only 2,236 (5.5%) commute to SD No. 9, Silicon Valley

For planning purposes, the MTC has subdivided the land area of the nine Bay Area counties into 34 "superdistricts". Four of these superdistricts are in San Francisco. This map shows the number of San Francisco residents living in each of the superdistricts whose jobs are located in the peninsula, i.e., southbound reverse commuters.
Data is from the 1990 Census.

Source: Detailed Commute Characteristics in the San Francisco Bay Area, MTC Working Paper #7, March 1994.

GZPM

PROPERTY MANAGEMENT

December 3, 2002

Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

RECEIVED
DEC 05 2002
PLANNING DEPT

RE: Transbay Terminal EIR

Dear Mr. Maltzer,

This letter is written on behalf of Bryant St. Associates, the owners of property located at 55 Stillman St., San Francisco.

I have reviewed the Draft EIR and find it lacking in assessing the impact of the proposed permanent relocation of bus storage during the day to an area between Stillman and Perry Streets, from 2nd St. to 4th St., San Francisco.

In determining the impact of this aspect of the Transbay Terminal Plan, the EIR fails to reference proposals currently under study by the City Planning Department to rezone much of the SOMA area, particularly the areas adjacent to the proposed bus storage yard. Part of the rezoning is to include residential uses.

If the City is actually looking to encourage housing in these areas, then the impacts of a permanent bus storage yard on such housing should be discussed. As an alternative to the proposed bus storage location referenced above, the document should consider alternative locations which would not impact potential housing contemplated by the rezoning.

The EIR should also consider whether daytime storage for AC Transit and/or Golden Gate Transit should be accommodated at all. Currently Samtrans, which provides routes which interface with Transbay Terminal, does not store buses near Transbay during the day. Perhaps a lesser cost alternative, and possibly a lesser impact-generating alternative, would be for AC buses to travel back to the East Bay after their morning runs, where such buses could be re-utilized more effectively during the day for East Bay transit riders. A similar analysis should be looked at for Golden Gate Transit buses, where such buses could be re-used during the day to serve San Francisco-Marin transit demand.

If the project removes the existing ramp structure, with its own attendant impacts, to generate an impact in a different location, then the general impact is not mitigated, just shifted to a new location. A re-assessment of the desirability of accommodation of daytime bus storage for commuters should be in order.

Thank you for your consideration.

Bryant Street Associates
GZPM, Managing Agent

Edward A. Green
Executive Vice President

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RECEIVED
NOV 12 2002

November 8, 2002

Via fax and U.S. mail:
Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., Suite 500
San Francisco, CA 94103-2414
Fax 558-5991

Planning Commissioners by fax:

Sue Lee 558-6409	Rev. Edgar Boyd	921-4966
Lisa Feldstein 221-8552	Michael Antonini	558-6409
Kevin Hughes 558-6409	William Lee	558-6177
Shelley Bradford Bell 558-6409		

RE: Urgent information regarding your upcoming meeting on November 12th for the Transbay Terminal Project.

Dear Mr. Maltzer and San Francisco Planning Commissioners:

I represent the owners of 25 Stillman Street and 35 Stillman Street. I am writing to request an extension of the public comment period for the Transbay Terminal DEIS/EIR. Further, I am requesting that you require a more in-depth analysis of the negative impact to the area of the proposed Bus Storage Area along Stillman and Perry Streets. Both of these requests should be granted for the following reasons:

- My clients and others in the Stillman/Perry Street neighborhood publicly voiced their concern regarding this bus storage proposal at the DEIS/EIR Scoping Meeting on April 4th, 2001, during the tape-recorded session for public comment. Notwithstanding this fact, Stillman and Perry Street buildings are not even mentioned in the report.

- Many people also followed up these comments with letters, again asking that the DEIS/EIR include analysis of noise, air quality, and traffic. Instead of covering these issues, there was only one small paragraph in the entire DEIS/EIR which mentioned the noise impact on the Second St. Clocktower building. There are many other residential and commercial buildings in the area, including a large, low-income project on 3rd and Perry, that would be even more severely impacted and they were not

included in the mitigation measure identified in the DEIS/EIR. We request that a quantitative analysis of noise impacts from the bus storage yard be prepared for the sensitive receptors adjacent to the proposed bus storage area, and that the mitigation measure be expanded as necessary.

- There is no analysis in the air quality section of the impact of diesel emissions on nearby residences adjacent to the bus yard. In fact, there is no mention of any change in diesel emissions. While there may not be any increase in regional emissions because the new Terminal might not increase the number of buses or distance traveled, there will be changes in the locations of diesel emissions with the new bus storage yard. Most emissions from diesel engines are relatively heavy particulates that are local problems. We request that a quantitative analysis be carried out of the impacts of additional diesel emissions using the methodology developed by the California Air Resources Board in their publication entitled "Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles" in Appendix VII (published in 2000).

- The west approach span of the Bay Bridge is a lid to the proposed storage area that is boxed in between Stillman & Perry. This configuration would force the toxic diesel fumes into the many residence and offices of this densely populated neighborhood. Most if not all of the buildings in this two-block area rely exclusively on open windows/external air for their ventilation.

- I am informed that several people, and possibly many more, who requested to be notified when the EIS/EIR was published, never received notification. My clients were not notified although their names were on the circulation list. They found out about it weeks later through a chance conversation with a friend. The public needs more time to respond.

- The area currently has to deal with the negative impact of the Bay Bridge at its doorstep. Further, those along Stillman and Perry will have to live with the 5-8 year demolition and rebuilding of the west approach of the Bay Bridge. They may also have to tolerate their main exit artery (2nd St.) being torn up for the proposed rail system. Any tenant or owner who sticks it out during this extended construction period (potentially a decade or more) shouldn't be asked to tolerate permanent health and noise hazards that this storage area would impose. If you put in a permanent, 2-block diesel bus storage area, you are effectively condemning the buildings in this two-block area.

I am enclosing some recent studies showing the toxic effects of diesel exhaust. I strongly urge that you make a site visit to the area and meet with the residents/tenants to more fully understand the impact of this proposal. Once you have done this I think you will agree that other sites would be more suitable for the bus storage area.

Because of the impending deadline for the public comment period, please respond to me in writing by November 14th regarding extending the public comment period and including a more in-depth analysis of the proposed bus storage area and site alternatives.

Thank you for your prompt attention to this important matter.

Very truly yours,

John R. Capron

JRC:rtc

Enclosures

cc: Francis B. Mathews
Jan Mathews

EPA: Diesel Fuel Exhaust Likely to Cause Cancer
03 Sep 2002 19:40 GMT

WASHINGTON (Reuters) - U.S. environmental regulators in a new report on Tuesday formally classified for the first time diesel exhaust from trucks and buses as likely to cause cancer in humans.

Green groups are seizing on the new report from the Environmental Protection Agency as proof the Bush administration needs to crack down on polluting diesel fuel emissions.

"This will underscore that diesel exhaust is a health hazard and should be controlled," said Frank O'Donnell at the Clean Air Trust, who called the report "the most in-depth health assessment to date" on diesel fumes.

Environmental groups are worried the Bush administration will roll back clean air regulations for diesel fuel.

The EPA in early 2001 issued standards to reduce diesel emissions from trucks and buses by more than 90 percent.

The administration said it backed those rules, but later said it might permit diesel engine makers to trade emission-reduction credits instead of producing cleaner trucks and buses.

The EPA is considering similar clean diesel standards for construction and farm equipment.

In addition to concluding that diesel fumes likely cause lung cancer, the EPA found diesel exhaust triggers asthma and other respiratory problems.

The agency said its report is based on exposure from diesel engines built prior to the mid 1990s. As new diesel engines with cleaner exhaust emissions replace existing engines, the report's conclusions will have to updated, it said.

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Environment

Diesel Fumes Mean Cancer for Thousands of Americans

By Cat Lazaroff

WASHINGTON, DC, March 15, 2000 (ENS) - More than 125,000 Americans may get cancer from breathing diesel fumes from buses, trucks and other diesel engines, says a new analysis by state and local clean air regulators. The officials are calling on the U.S. Environmental Protection Agency, which is planning to release new restrictions on sulfur in diesel fuel within two months, to take strong action to address this health risk.

Diesel vehicles are among the prime sources of the pollution that leads to smog (Two photos courtesy EPA)

The analysis, by the State and Territorial Air Pollution Program Administrators and Association of Local Air Pollution Control Officials (STAPPA and ALAPCO), comes as the oil industry seeks to kill a proposed EPA plan to clean up diesel buses, trucks and diesel fuel. The EPA proposal is still under review by the White House Office of Management and Budget.

Calling diesel emissions an important health hazard, the EPA has announced it will release a new rule by the end of April requiring sharp cuts in the amount of sulfur allowed in diesel fuel.

Diesel engines are significant contributors to air pollution. The hazardous mixture that comprises diesel exhaust contains hundreds of different chemical compounds that wreak havoc on air quality, playing a role in ozone formation, particulate matter, regional haze and acid rain.

Diesel exhaust contains more than 40 chemicals that are listed by

the EPA as toxic air contaminants, known or probably human carcinogens, reproductive toxins or endocrine disrupters.

Vehicle exhaust also contributes to acid rain, and can lead to illness in humans

"There is no pollution more disgusting than the thick, noxious, suffocating smoke that billows from trucks and buses," said Becker. "But even worse, these fumes are putting us at risk of cancer - risk that can be almost completely eliminated with modern pollution controls."

Last fall, the South Coast Air Quality Management District, which sets air standards for the Los Angeles, California region, released a report analyzing the cancer risk in the region from exposure to diesel particulates. The agency concluded that mobile sources are responsible for about 90 percent of the cancer risk in the area, and that 70 percent of the total cancer risk is attributable to diesel particulates.

That study prompted STAPPA and ALAPCO - the national associations of state and local air quality control officers in the states and territories and more than 165 metropolitan areas across the country - to extend the evaluation to other cities nationwide.

Among their results: Over a lifetime of exposure to diesel fumes, an estimated 119,570 people in metropolitan areas, and an additional 5,540 in suburban and rural areas, will develop cancer. Large cities, including Los Angeles, New York City and Chicago, Illinois, could see thousands of cancer cases each.

STAPPA and ALAPCO want the EPA to require trucks to operate as cleanly as current laws mandate
(Photo courtesy Daimler Chrysler Corp.)

STAPPA and ALAPCO have joined major health and environmental groups in urging EPA to issue tough new diesel standards. Among their recommendations, the groups said EPA should set an extremely strict national limit on the amount of sulfur in diesel fuel - capping sulfur at less than 15 parts per million - by no later than mid-2006. The groups also want an intermediate cap of 30 parts per million to take effect by 2004.

http://ens.lycos.com/ens/mar2000/2000L-03-15-07.html 9/6/2002

The EPA has not yet released any specific numbers that will be included in its new sulfur rule.

Sulfur is a poison for diesel pollution control devices, much as lead was a poison to catalytic converters in the 1970s. The groups noted that California recently set a diesel sulfur cap of 15 parts per million for urban buses that continue to use diesel fuel. The groups said the national standards should apply not only to truck and bus fuel, but also to fuel used in "nonroad" diesel engines, such as construction equipment.

Oil refiners warn that the technology does not yet exist to produce fuel clean enough to meet the groups' requirements. Developing such fuel would be prohibitively expensive and could drive some refiners out of business, warned the American Petroleum Institute (API), a trade group. But API and other groups have volunteered to reduce sulfur by 90 percent from its current cap of 500 parts per million, bringing the sulfur content of diesel down to 50 parts per million. That reduction could add five or six cents to the price of a gallon of diesel fuel, said API spokesperson Edward Murphy.

Oil refiners say dramatic cuts in sulfur could prove prohibitively costly (Photo courtesy North Atlantic Co.)

Officials from the National Petrochemical Refiners Association (NPRA) and Petroleum Marketers Association of America sent a letter Tuesday to EPA Administrator Carol Browner warning that sharp sulfur reductions could result in dramatic cost increases and an unreliable supply of diesel fuel and related products.

"EPA's proposal for diesel sulfur is likely to reduce the supply of diesel fuel as well as heating oil and even gasoline," the letter said. "It is our understanding that the EPA proposal calls for a reduction of the onroad diesel sulfur cap from 500 parts per million (ppm) to 15 ppm in 2006. The proposed cap and timeframe are in excess of what is feasible or advisable from either an energy supply or environmental standpoint."

STAPPA and ALAPCO also want the EPA to set tough standards for diesel soot and smog-forming nitrogen oxide emissions from new trucks and buses by 2007. Emissions could be reduced by at least 90 percent through use of low-sulfur fuel and advanced exhaust emission controls, they noted.

STAPPA and ALAPCO want emissions reductions for construction equipment as well

(Photo courtesy Nebraska Machinery Co.)

Equivalent emission standards should be set for construction equipment and other big nonroad diesel engines, the groups advised.

Big diesel trucks, buses and nonroad engines should be required to operate as cleanly in use as they are supposed to, the groups said. The groups noted that for more than a decade, seven of the biggest diesel engine makers installed illegal "cheater" devices on well over a million trucks, allowing them to pollute more on the road than in pre-sale tests. These same engine makers are now trying to weaken the Consent Decrees that were reached last year with EPA and the Justice Department to settle these environmental violations.

The Clinton administration is taking actions to reduce pollution from trucks and other large vehicles. The Department of Energy (DOE) announced earlier this month it will partner with the heavy duty vehicle industry in a $30 million to $50 million research project to develop cleaner and more fuel efficient trucks. Over the next five years, the joint research effort will help researchers develop more energy efficient trucks, ranging from pickup trucks/sport utility vehicles to eighteen wheelers. Seven teams from the industry will join the DOE to develop clean energy technologies that will make trucks cleaner, more fuel efficient, and promote the use of alternative fuels.

"The research partnerships between the federal government and the private sector are critical to reducing America's reliance on imported oil, maintaining economic viability of our industries, and improving air quality," said Energy Secretary Bill Richardson. "With projections indicating that trucks will use twice as much fuel as cars by 2020, it is critical that we look to improve fuel efficiency and clean energy technologies."

About $5 million will be awarded this fiscal year. Three teams will develop hybrid propulsion systems utilizing a natural gas engine an electric powertrain for buses and urban duty trucks, such as delivery vans and heavy-duty vehicles. The teams will match DOE funding dollar for dollar. Four other research teams from industry will develop advanced components to reduce the fuel consumption and emissions from truck diesel engines. Because these projects are considered more risky, these teams will spend $3 for every dollar granted by DOE.

Becker noted that dozens of human epidemiological studies have found a link between diesel soot and lung cancer. STAPPA/ALAPCO's nationwide cancer projection "is an extremely conservative figure," using a method similar to that used by regulators in California to estimate diesel-related cancers there, he noted.

"In fact, the actual number of cancers could easily be ten times higher," Becker said, adding that "the important thing to keep in mind is that we are facing a cancer risk - a risk we cannot avoid

unless EPA takes decisive action."

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RECEIVED
PLANNING DEPT

October 31, 2002

Joan Kugler
AICP, EIR Project Manager
San Francisco Planning Department
1660 Mission Stree, Suite 500
San Francisco, CA 94103-2414

Dear Ms. Kugler,

I have become aware of a plan to use the Stillman Street parking lots between 2nd and 4th Streets for bus storage. This is not a good idea. This is a heavily populated area 24 hours a day, especially during working hours when all of the adjacent buildings are full of working tenants and residents.

I have been a tenant at 35 Stillman since 1991, when this neighborhood was next to nowhere. I've seen the dot com boom come and go, experience the snarling foot and car traffic of Giants games, and expect the Bridge retrofit to cause a major disruption sometime soon.

Idling buses should not be added to the mix! Please consider the alternatives.

Thank you,

Steve Caramia
Caramia Design
35 Stillman, Suite 108
San Francisco, CA 94107

Elizabeth Carney
George Canciani
461 Second Street, #459
San Francisco, CA 94107

Nov. 26, 2002

To: Joan Kugler
AICP, EIR Project Manager
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103

Dear Ms. Kugler,

While we are all in favor of efficient and effective public transportation, the concerns of the 127 families at the Clocktower Lofts (Second St. at Bryant) have not been adequately taken into account in the development of the Trans Bay Terminal Plans, specifically the development of the bus storage and maintenance area indicated in the Draft EIR/ EIS and the construction and operation of the trains and tunnels.

This project is complex and the issues require more time to study. Now that we, as residents, understand how complex, we need more time to consult experts and analyze these issues. We think that a better project will result in the future if we take the additional time now to take more comments from residents and businesses. Also a new draft EIR should be prepared and circulated for comment because impacts on environment (eg. Diesel emissions) have not been presented and analyzed.

TransBay Tunnel and CalTrain Extension
Other Solutions Can Be Found
Bus rapid transit could replace the rail system proposed here at much lower cost.

There are many impacts during the construction and operation of the CalTrain extension tunnel. What are those construction impacts? What is the damage to the building that might result and how can those risks be managed? Is there blasting? Would the construction structurally undermine the building? While we believe the Clocktower is on rock, the geological studies contained and reported in the EIR conflict with other reports on hand regarding the quality of the rock, with more sand and sandstone than reported. This is a 127 family work / live loft building, with requirements for access and functioning during work hours and in the evening and night. The construction plans do not take this into account.

What are the impacts during tunnel operation: of vibration, from exhaust, from noise from the operation of the trains must be studied in detail, as the EIR fails to even recognize the hallway as a part of the residence.

Bus Storage and Maintenance
Located between Second and Fourth Streets at Stillman, facing our building, the bus yard would be an atheistic issue and concentrate congestion, vibration, noise and diesel emissions in an enclosed area not appropriate for the high density residences and businesses.

EIR Not Responsive to Residents
We already expressed our concerns at the Public Hearing April, 2001, and in writing, requesting a study of the Effects of Emissions on the many residences and businesses. We are concerned that public safety needs are not being met and we are considering legal action. Until now, we have been nearly ignored in the process, we are not on the distribution list for information, nor is the Clocktower—an historic building—listed in the EIR/ EIS roster of buildings of historic merit. Where we do appear in the EIR, the sound wall

mitigation is directed to the wrong side of the property. (The Clocktower is on the East side of the property in question).

Other Locations Can Be Found
The function of day storage of AC Transit Buses, and Golden Gate Transit Buses can be contained within the TransBay terminal and adjoining buildings. For example, as David Baker and Associates Architects have recommended, it could be the first level of a multi- level residential development such as the Spear or Folsom projects. Adjoining the terminal project itself, its location there or at an alternative location would be more appropriate than in the middle of a dense residential and small business area–this is not an empty vacant area of abandoned lots.

Other possible locations could be explored, such as:
Widen the area now used for this bus storage and leave it where it is
Caltrans paint yard at Bryant and Main (Build double deck with bus storage below)
4th and King
Port Property- vacant piers
Ground level of property being developed adjacent to Transbay Terminal- such as 201 Spear and 300 Folsom.

When contemplating the new locations. given the carcinogenic classification of Diesel particulate, staging of buses should be inside, allowing the filtering of ventilation. New models of buses which use of particle traps, new clean burning diesel buses (or vegetable oil technologies) or electricity can be utilized.

Combination of Impacts: Existing Planning Already Puts Hardship Burdens on Neighborhood Families and Small Businesses
In the San Francisco Planning Document for the new Giants Stadium EIR and "Pacific Bell Park Transportation Management Plan", April, 1999, the area in question for the proposed bus yard is already part of the parking plan and mitigations to accommodate the needs of the Giants and neighborhood during games. In the same document the Second Street area has been designated a walking and bicycle zone, not a bus bridge. Many mitigations have been made already to accommodate the Giants plans. Please do not add additional burdens on this neighborhood. Parking is already very difficult here for small business and residents alike.

The Transportation Management Plan notes " An important objective of the Pacific Bell Park parking plan is the program to protect residential parking supplies in neighborhoods nearby the ballpark. The San Francisco Redevelopment Agency Rincon Point-South Beach Citizens Advisory Committee (CAC) has indicated that residents and businesses...are very concerned about not being severely impacted by baseball traffic or parking..."

The planned demolition and rebuilding of this area for the Bay Bridge approach will eliminate approximately 1,000 spaces of the parking and add construction for upwards of five to ten years. Please do not add additional burdens on this neighborhood's small business and families.

Traffic Congestion already High
The pressures on Second Street, Third and Fourth Street and around the Bay Bridge approaches during the evening rush hour are already very intense for this neighborhood. Contemplating a heavier use by adding buses to exit on these streets seems unlikely to succeed.

Health Issues and Public Safety Need to Be Addressed
Diesel fumes are carcinogenic and funnel directly into the building in the current plan. Fumes will accumulate under the low bridge approach and funnel directly into the first level of the building. New CalTrans designs will make it worse with the first deck even closer to the building. No on seems aware of the air pollution issues from the EIR team. Have there been visits made looking at this issue? A study of Air Pollution Emissions should be made, especially with respect to diesel emissions.

The Clocktower has 127 families, including small children for whom diesel fumes are especially dangerous. Stillman Street is also a high density residential and small business population. Both we and our neighbors rely on open windows for ventilation.

Noise and vibrations from buses will adversely affect occupants. Safety to pedestrians needs to be enhanced in the walk down Second Street.

The Clocktower is an historic building in an historic area. Every effort should be made to have aesthetic approaches to these problems. As we have just received the 500 page EIR/ EIS document, there has not been time to study, consult experts and analyze all of the effects of the proposed plan on the Clocktower Building and neighborhood. Please extend the public input comment period, it will enrich the final solution. We and the Clocktower join all the comments submitted by everyone else regarding the TransBay Terminal. We request to be placed on the notice list for all documents, proceedings and for a copy of the "Response to documents" when prepared.

I enclose a petition signed by residents.

Thank you for your attention to our concerns.

Sincerely,

Elizabeth Carney
George Cardiani

cc. Planning Commission
Redevelopment Authority

A Petition Against the Proposed Transbay Terminal AC / Golden Gate Transit Storage Area

We, the undersigned, do not want the parking lots on Stillman between 2nd St. and 4th St. to be used for AC / Golden Gate Transit bus storage for the following reasons:

1. The Bay Bridge retrofit project is scheduled to have a major impact on our neighborhood for over 5 years (for most of us, right at our front door step). We should not be subjected to additional noise, pollution and inconvenience which this bus storage would impose.
2. The structure of the bridge approach over the Stillman St. parking lots creates a "tunnel" effect, which would further compound the impact of the bus exhaust on the air quality in the area. This not only affects pedestrians, but also impacts the many buildings in the area that use open windows as their only form of air circulation.
3. Since this lot is close to the Giant's stadium, it is used extensively for overflow parking during the day and evenings.
4. There is a real need for parking in this area -- not only for the commercial buildings - but also for the large number of live/work lofts in the area.

Signature	Name	Address	(Optional) E-mail or phone (for updates on this issue)
[signature]	Elizabeth Carney	461 Second St #459 SF 94107	ecarney@tribalcode.com
[signature]	Robert Reeves	461 2nd St #309 SF 94107	
Thomas Chiang	Thomas Chiang	461 2nd St. #310 SF 94107	
[signature]	Linda Hahn	461 2nd St 7552 SF CA 94107	
[signature]	A. Pfeifer	461 "	
[signature]	Sebastien Trouplin	461 second street #119 SF, CA 94107	
[signature]	GEORGE CANCIANI	461 SECOND ST. #459 SF CA 94107	
[signature]	Molly M. Last	461 2ND St #113 94107	LastMM160@aol.com
[signature]	Edward Pollak Jr	461 2nd St. #104 SF CA 94107	epollak@aol.com
Ed Short	J. Edward Short	461 2nd St. #C-328 SF 94107	edshort39@earthlink.net
Ann Short	Ann SHORT	461-2nd St #C-328 SF 94107	aaphilo@earthlink.net
Charles Wallis	Charles Wallis	461 2nd St #7560 SF CA 94107	
[signature]	MONICA DUCLAUD	461 2nd St. #230, SF, CA 94107	duclaud@pacbell.net

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4. There is a real need for parking in this area -- not only for the commercial buildings - but also for the large number of live/work lofts in the area.

Signature	Name	Address	(Optional) E-mail or phone (for updates on this issue)
	Tom Burkhart	461 2ND St #151, 651, SF, CA	
	Chris McMaster	461 2nd St #151, SF	
	Joseph Sima	461 2nd St #151 SF CA	
	Brian Zgierski	461 2nd St #151 SF CA.	
	Lorraine Sommers	461 2nd St #151 SFCA	
	Pamela Hunt	461 2nd St #151 SFCA	
	Carol Burkhart	461 2nd St #151 SF, CA	

A Petition Against the Proposed Transbay Terminal AC / Golden Gate Transit Storage Area

We, the undersigned, do not want the parking lots on Stillman between 2nd St. and 4th St. to be used for AC / Golden Gate Transit bus storage for the following reasons:

1. The Bay Bridge retrofit project is scheduled to have a major impact on our neighborhood for over 5 years (for most of us, right at our front door step). We should not be subjected to additional noise, pollution and inconvenience which this bus storage would impose.
2. The structure of the bridge approach over the Stillman St. parking lots creates a "tunnel" effect, which would further compound the impact of the bus exhaust on the air quality in the area. This not only affects pedestrians, but also impacts the many buildings in the area that use open windows as their only form of air circulation.
3. Since this lot is close to the Giant's stadium, it is used extensively for overflow parking during the day and evenings.
4. There is a real need for parking in this area -- not only for the commercial buildings - but also for the large number of live/work lofts in the area.

Signature	Name	Address	(Optional) E-mail or phone (for updates on this issue)
[illegible]	ANNA EWINS	461 2nd St C336 SF	415-543-5435
[illegible]	DAVID HOFMANN	461 2nd St #661	415-546-9262
[illegible]	GEORGE CANCIANI	461 SECOND ST #459	415-442-0262
[illegible]	ARTHUR MEADER	461 2nd St #455 SF	243-0735
[illegible]	RICHARD BRECHIN	461 2nd St #551	896 6900
[illegible]	RICK ELLETTER	461 2nd St #204	543 2790
[illegible]	Linda Winn	461 2nd St #224	281-3846
[illegible]	Stephen Hiley	461 2nd St #134	371-1655
[illegible]	AARON ZEFF	461 2nd St #561	495-6625
[illegible]	TOM BURKHART	461 2nd St #651	543.9963
[illegible]	Susan Verba	461 2nd St. #231	546.7832
[illegible]	Greg Lynch	461 2nd St. #202	546.7832
[illegible]	Chih We Mou	461 2nd St. #106	415-777-5246
[illegible]	Ala Mou	461 2nd #116	415-401-9010
[illegible]	ZELJKO MARKOVIC	461 2nd St. #302	415-546-6356
[illegible]	REBECCA MAHMOUD	461 2nd St #658	415.826.1340
[illegible]	ALAIN MAHMOUD	"	"
[illegible]	LYNDA ZMAK	49 ZOE St #6	
[illegible]	[illegible]	1219 KIRKHAM ST	415 566-5458

A Petition Against the Proposed Transbay Terminal AC / Golden Gate Transit Storage Area

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3. Since this lot is close to the Giant's stadium, it is used extensively for overflow parking during the day and evenings.
4. There is a real need for parking in this area -- not only for the commercial buildings - but also for the large number of live/work lofts in the area.

Signature	Name	Address	(Optional) E-mail or phone (for updates on this issue)
Emily Bell	Emily Bell	461 2nd St. #112	415-348-0016

November 7, 2002

Joan Kugler
AICP,EIR Project Manger
San Francisco Planning Department
1660 Mission Street: Suite 500
San Francisco, CA 94103-2414

THE ORIGINAL
MICROFIBER TOWEL
COMPANY SINCE
1990

Dear Joan Kugler:

I am writing this letter to you to implore you to reconsider using the Stillman Street parking Lots between 2nd and 4th streets as bus storage. Stillman street residents and businesses will already be severely affected by the rebuilding of the bridge approach, do we also need to be subjected to reduced air quality by bus emissions?
If you visit our little neighborhood of businesses and homes you will see that the parking lots are a closed environment. The freeway overhead closes in the lots that are closely bordered on each side by buildings. These buildings house our businesses and our families. This is not an industrial park, this is a neighborhood.
Please help us to continue the growth of our area, not contribute to its demise.
I am sure that you can find a great alternative area in a place that would not be as negatively affected as our street. May I suggest 4th and King, or the Pier across from Bayside, or Port property, or how about under some of the property being built adjacent to the Transbay Terminal?

Thank you,

Myron Chadowitz
Operations Manager
Britanne Corporation

BRITANNE CORPORATION
145 STILLMAN
SAN FRANCISCO CALIFORNIA 94107
415-495-7210 FAX 415-495-6943
E-M BRITCORP@AOL.COM WWW.AQTIS.COM

BRITANNE EUROPE N.V.
MEIR 44A
2000 ANTWERP BELGIUM
32-03-227-3409 FAX 32-03-226-4482
E-M BRITANNE@ABC.BE WWW.AQTIS.COM

COMMENTS REGARDING THE TRANSBAY TERMINAL EIR/EIS

To: Joan Kugler, EIS/EIR Coordinator, City Planning Dept., San Francisco
From: Bernie Choden
(85 Cleary Ct., # 11, S.F., 94109 @ 415-9297714/fax:15).
Nov. 16, 2002

CEQA law permits a challenge of the fiscal feasibility necessary to assure mitigation of environmental concerns. **Are there sufficient economic means to pay for the necessary mitigation depending upon what is proposed? Are the mitigation concerns sufficient to deal with cumulative impacts?**

It is not only that this EIR/EIS document does not specify how to pay for mitigations, this document doesn't say what the needed mitigations are (as the document should have done in Chapters V and VI). For example, this document cites traffic impacts as immitigable and, yet, does not acknowledge the impact of unmitigated traffic impacts on the cost of doing business or living in this area. The document does not cite other economic and environmental mitigation needs of adjacent business and residential uses that now exit or would be exacerbated or be created by the project. Vaguely, this document says that there may be an examination of these issues after the approval of this document. **Mitigation is an essential component of an EIR; without identification of mitigation need and mitigation measures, this document is not certifiable.**

Mitigation revenue resources appears almost solely dependent on project internal subsidies from tax increments. Tax increments, alone, are the least advantageous means of repaying public investment for this high environmental impact.

> Almost a third of redevelopment increments are directed by law to go to school districts off the top. Secondly, the inflationary cap on increments is 2%; that means that the value of a dollar now will be only $0.50 later given normative rates of inflation. It also means that developers receiving tax increment assistance now will be paying off that assistance 10 years from now will do so with dollars worth half as much.

To provide adequate long-term mitigation revenues, I strongly suggest the project use of ground rents from public land ownership underlying the entire redevelopment project as the best means of paying (a) for the project, (b) mitigating environmental design and social impacts and, (c) controlling future design and development. The reasons are:

1. **Market rate development prospects remain relatively high despite a national economic downturn.** Mid-level and high-end rents in the City continued to inflate above 10% last year. A ground rent of a normative 3% on the value of development would only add) 0.5% to the operators' annual cost of a project, definitely too little to discourage investment in this premier market. (Regardless of what you've heard)
2. **Ground rents (G.R) remain in constant dollars unlike tax increment dollars.** They will still be worth a real dollar years from now.

3. **Front-end money** will come from the sale of development rights just at it would, and almost in same amount, from the sale of the title to the land.
4. The R.A. would receive the equivalent of tax increments (possessory interest taxes) anyway in addition to GR. As a result, the R.A. (and city) would receive, initially, **four times** as much cash flow as from T.I. only.
5. Further, **the use of G.R. would be much more flexible than for T.I.** such as the ability to match it to developer incentives and operators underwriting (think non-profits).
6. **The value of G.R. would increase with value of investments.** The developers would be able to go in cheap and pay out when they were profitable.
7. **Contracts regarding G.R. could control the design and operations of the project as a the most efficacious legal means of protecting the public investment and the future design of the terminal area.**. We should look to the Embarcadero Center as a good design example of how to provide residential uses within a high intensity commercial area.

I request an economic study directed toward the means and amount of cash flow from the project needed to provide environmental mitigation. Necessarily, approval of the terminal should be contingent how the redevelopment economics shapes up, particularly regarding other city resource needs and, in particular, the provision of a high quality, high-density residential environment within and adjacent to the project. **Design isn't just about how the environment looks; it is also about how it works far into the future.**

My experience with the Martin Luther Towers project in the Western Addition # 1 Redevelopment Area challenges the assumption that the Redevelopment Agency can be trusted to mitigate the Terminal's environmental impact. In the MLT situation, the RA stated that it would be selective as to what project areas it would honor regarding contractual obligations between the Agency and a beneficiary should the project become deactivated. **The Terminal project, therefore, requires an objective environment monitor (as in the Mission Bay Project) who can ensure enforcement of the R.A.'s public contractual obligations regarding development and mitigations.**

Summary:

This city needs improved rail transit access, but this proposal requires the integration of rail transit design with the design of the other uses necessary to make this project:

1. An integral, attractive and beneficial part of the city.
2. A means to pay for the project and its environmental impact measures

This document spends so much effort describing the transit project that, apparently, there is little space and effort applied to identifying and providing a clear list of mitigations, their costs, how to pay for mitigation, who will be responsible, and how implementation will be monitored. **This is not, as presented, a certifiable EIR/EIS document.**

21 Stillman Street, #2
San Francisco, California 94107
415-543-5114
dk-sf@pacbell.net

18 November, 2002

Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, California 94103

SUBJECT: DEIS/DEIR/Section 4(F) Evaluation for the Transbay Terminal/ Caltrain Extension/Redevelopment Project

Dear Sir,

I live in the project area. The neighborhood needs parks. I am concerned that an opportunity to establish a park where my dog can play will be lost. Especially, when I read that all that is foreseen in the Redevelopment are 'two new "green" open spaces'. What does this '"green" open space' mean? (5.5.1 (p.5-39))

Car-boosting and homeless encampments are quality-of-life issues for the street. The proposed Off-Site Bus Storage Facility between Perry and Stillman and Second and Fourth Streets is under the jurisdiction of the Transbay Terminal. Will transit agency police patrol the lot, or will SFPD? Did the police union agree that by reorganizing existing staff no additional officers would be needed? I am concerned that the police will be spread thin and crime will increase on Stillman St. (5.4.2.2) and (5.4.4.2).

Since the Off-Site Bus Storage Facility is proposed right across the street, I read that section carefully. There is no Air Quality analysis of the bus storage lot (5.7.2). With all those buses idling underneath the freeway with nowhere for the air to go, I think it is fair to ask about Carbon Monoxide "pooling" on Stillman Street. The building in which I live is mixed-use. Five of the six units are residential and rely on open windows for cooling and ventilation. Diesel fumes and particulate impacts of the proposed bus storage lot are not addressed in the report (Table 5.7-3); therefore, the project does not conform with 40 CFR Part 93 especially section 116 (5.7.3).

I am pleased that noise mitigation is proposed for the bus storage facility. My concern is that the report mentions my neighbors in the Clock Tower without reference to other residential buildings on Stillman Street and a low-income residence on Perry, Yerba Buena Commons (5.8.7). Will noise mitigation apply only for those who live in the Clock Tower?

The report does not specify that the access ramp from the storage lot to the Terminal will be grade separated at Second Street but it does state at-grade mid-block crossing of Third Street (5.19.1.1, page 5-114 and 5-115). If the all buses in the two-block long storage lot cross Second Street and Third Street mid-block at-grade in order to return to the Terminal during the afternoon rush hour, I think that that will have an impact on vehicular traffic on Second Street. It is not addressed (Table 5.19-5) or (5.19.4.3). Third Street is defined out of the project area.

Why not locate the bus storage above the new terminal as they do at the Port Authority of the Hudson bus station in New York City? If it has to be across the street, I am looking to ensure the most beneficial impact.

The tunneling option for the Caltrain Extension is better for the area because it destroys fewer historic buildings in the neighborhood (Table 5.14-1) and has less construction impact on our street (5.20).

Construction impacts to streets (Table 5.21-3) does not address the mid-point access for construction of the tunnel on Second Street near Brannan Street mentioned in the last paragraph on page 5-155 (5.20.2).

Visual and aesthetic impact is hard to quantify. If we can try to improve the project keeping in mind its overall sculptural qualities and incorporating ornamentation and variation of form with the fabric of the district architecture, I hope that this will last another seventy-five years. The ramps need to be more than just 'less visually intrusive due to their uniform appearance and minimal supporting structures' (5.16.2 page 5-93). That sounds like a causeway to me. The sound-walls of the proposed off-site bus storage facility likewise must be architecturally related to the street. Overall, the Redevelopment District needs to have a variety of heights, mass, texture, and style. Please not another Embarcadero Center One, Two, Three, Four!

Thank you,

James Wittmann Dear

askmar
610 Gilbert Avenue, Suite 19
Menlo Park, CA 94025
mark@askmar.com

November 18, 2002

Joan Kugler
City and County of San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103
(415) 558-5983
joan.kugler@sfgov.org

Dear Ms. Kugler:

This letter provides my comments in regards to the draft environmental impact statement for the proposed TransBay terminal, Caltrain extension, and redevelopment.

(1) Although Muni has no interest, there would be cost savings and reduced total overall environmental impact to the City of San Francisco if the depth of the trench was increased on 2nd Street from Townsend to Mission, to be sufficient to run Muni on an upper level, and heavy rail on a bottom level. (This would be instead of the proposed 3rd Street Muni underground line extension.) I would suggest that Muni could make a dogleg from 2nd down Mission, stopping at the Convention Center, and proceeding down 3rd for the remainder of the line as planned. In addition, it is my understanding that the mezzanine level of the TransBay terminal could accommodate Muni light rail trains, were this connectivity so desired, and this approach would enable this to happen.

(2) While some have questioned if six platforms offer adequate capacity, my suspicion is that the combination of tail tracks at the TransBay terminal and sidings at 4th and Townsend, can be sufficient with efficient operations. However, loading and handling of luggage for passengers traveling to SFO and on future high-speed rail service may cause capacity problems due to excessive dwell times. (As a side note, it appears that the terminal does not have any special provision for passenger luggage, i.e. it appears to assume everyone uses carry-on luggage.)

(3) Obtaining the maximum density in the immediate areas around the TransBay terminal makes good sense from a planning viewpoint. It also improves the economics and feasibility of the terminal, and reduces potential taxpayer liabilities.

(4) There exists a question in my mind as to whether there is sufficient redundancy and capacity in the efficient and compact TransBay design to accommodate accidents and equipment failures without undue delays.

Sincerely,

Mark Duncan

RECEIVED
DEC 20 2002
PLANNING DEPT

December 19, 2002

Via Fax and US Mail
Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission St., Suite 500
San Francisco, CA 94103-2414
✓FAX 558-5991

Planning Commissioners by FAX:
✓Sue Lee 558-6409
✓Lisa Feldstein 221-8552
✓Kevin Hughes 558-6409
✓Shelley Bradford Bell 558-6409
✓Rev. Edgar Boyd 921-4966
✓Michael Antonini 558-6409
✓William Lee 558-6177 – needs new number

Dear Mr. Maltzer,

As the owners of 25 Stillman St., 35 Stillman St., 470 Third St. and 585 Howard St, we ask that you read and respond to our concerns regarding the Transbay Terminal Project EIR/EIS.

- The Stillman St. site is unsuitable for bus storage because it is a highly populated area with hundreds of residences, and many high-density office buildings in this two-block site.
- Most if not all of these buildings have operative windows and employ external air as their sole source of ventilation. The diesel exhaust, noise and additional traffic impact of a bus storage site is inappropriate and dangerous in our highly populated neighborhood.
- The "San Francisco Planning Department SoMa Community Planning Process Rezoning Alternative" Draft Packet dated Nov. 19, 2002, shows that the plan for this neighborhood is to encourage an even higher percentage of residential and office use. Putting a bus storage site in the middle of this would not be a compatible use for this area.
- As there are families and a school site in this 2-block area, a much more extensive analysis of air quality, sound, vibration and traffic would have to be implemented. Please note that the State has now banned idling buses near schools. The California Air Resources Board passed this measure on Thursday, December 12th, 2002. Before expending a lot of money to do these extensive studies, I hope you instead determine, with the additional information that you have before you, that alternative sites should be considered instead.
- Traffic to and from the proposed bus storage would have a significant impact on the already burdened Third Street and Fourth Street corridors.

Alternative location for the Bus Storage Facility.

- Those buses that don't need frequent access to the Transbay Terminal should be stored in a more industrial area, away from residences and high-density office use. Alternatively, they should be put into circulation in Marin, the East Bay and San Francisco to make a more frequent and efficient bus service (see paragraph below on "Bus Rapid Transit").
- The buses that do need access to the Terminal should be stored in or closer to the Terminal. One option would be to use the 2 lots on both sides of Howard St. at Beale under the bus ramp. There is substantially more height clearance at this location and it is much closer to the Transbay Terminal.
- Alternatively, the bus storage could be designed into one of the adjacent re-development projects or into the Terminal itself.
- Traffic in the South of Market area would be much less impacted by a bus storage site closer to the terminal.

Bus Rapid Transit:
Both the "cut & cover" and the "tunneling" options for the Caltrain extension would be disruptive to our neighborhoods. Please do an analysis of a "Bus Rapid Transit" alternative.

- This would be more cost effective and less disruptive.
- It could utilize more of the "idle" buses during off peak times by setting up a system that would be fast, easy and encourage increased ridership. This would decrease the amount of space you would need for bus storage, and thus could incorporate the smaller storage site into the Transbay Terminal development site.

To quote Stuart Cohen of the Transportation and Land Use Coalition (San Francisco Magazine, Dec. 02) "Together, AC Transit and Muni already carry close to 60 percent of the transit riders in the Bay Area, and both bus companies say they could add a whole lot more with a few innovations. In the cities, they would introduce what's known as "bus rapid transit" on major arteries....These buses would operate like trains, traveling in their own lanes, with the ability to trip traffic signals so that they don't get stuck at lights. The buses would make fewer stops, and the bus shelters would be more like train stations, with protection from the rain and signs that give real-time projections about when the next bus is arriving. Throughout the cities, buses would be frequent and fast (even during off-peak times).....especially in neighborhoods where people don't have cars. .....Along two major corridors in Los Angeles, where "bus rapid transit" is a top funding priority, installing such a system has reduced bus riders' commute times by 25% and increased ridership by close to 40% (See :Trains vs Buses: The L.A. Lesson.")

Notices and Responses:
We are concerned about the lack of notice of meetings, the lack of response to our initial input at the scoping meeting and follow-up letters. Although we were on the "distribution list" for the EIR, we did not receive it and had to call to get a copy after finding out that it was available through a chance conversation with a friend.

- If you have not already done so, please add us to your list for notices of <u>all</u> meetings regarding the Transbay Terminal and any other meetings that deal with the Bus Storage Site, the 2nd St. Caltrain connection and the 3rd St. rail.
- Please send us the "Response to Comments" that addresses our letters and other letters submitted for the Transbay Terminal EIR/EIS.
- We would like our buildings to be included in the analysis of any other issues of the Transbay Terminal and related projects (i.e. Bus Storage, 2nd or 3rd St. rail projects)brought up by others regarding our neighborhood (2nd St., 3rd St., 4th St., Stillman St. and Perry St. as well as Howard St.)
- My husband spoke at the initial Scoping meeting in April 2001 and we reiterated our concerns in two subsequent letters (May 18, 2001 & Sept. 30th, 2002 – see attached) and at the Planning Commission meeting in November 2002. Our attorney, John Capron, also submitted a letter (attached) in November, 2002. Those comments are all incorporated by reference in these comments.

Sincerely,

Francis and Janice Mathews
35 Stillman St, #300, San Francisco, CA 94107

MDC
PROPERTIES, INC.

May 18, 2001

Ms. Joan Kugler
Environmental Planner
City and County of San Francisco
1660 Mission Street; Suite 500
San Francisco, CA 94103-2414

Subject: CalTrain/Transbay Terminal Connection.

Dear Ms. Kugler,

We are writing to express our concern over a proposal linked to the above mentioned project, requiring the closing of the Stillman Street parking lots between 2nd and 4th Streets. We understand that an EIR is underway and we would like the report to address the following:

Air Quality-the proposed bus parking lot is located under the concrete west approach to the Bay Bridge with residential and commercial buildings fronting both sides of the parking lot. Diesel fumes from idling buses would be trapped in this tunnel-like environment polluting the air that ventilates through the adjacent buildings. The Planning Department approved numerous live-work projects on Stillman Street; Clocktower lofts, 21 Stillman, etc combined with several existing apartment buildings, the bus parking lot certainly is not harmonious to our environment.

Recently we visited the Golden Gate Transit and Sam-Trans bus parking lots and were alarmed to find the buses idling with diesel fumes spewing out long before exiting the parking lots.

Our neighborhood will be severely impacted by the demolition and re-building of the Bay Bridge west approach as well as the potential construction of the 3rd Street Muni Line--- we should not be subjected to additional, ongoing noise and pollution from the bus storage.

Alternatives: We recommend the following alternative locations be considered for the bus storage:

1- CALTRANS paint yard on Bryant and Main, a two-story structure would allow for the maintenance yard and courtyard on top, and bus storage below.
2- Treasure Island
3- 4th and King Streets
4- Pier/Port property across from Bayside Village
5- Incorporated with the development, lower levels of adjacent parcels to the Transbay Terminal

Sincerely,

Francis Mathews

Brokerage & Development 35 Stillman Street, Suite 300 San Francisco, CA 94107 (415) 957-0463 Fax (415) 957-0495

MDC
PROPERTIES, INC.

September 30, 2002

Ms. Joan Kugler
Environmental Planner
City and County of San Francisco
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Subject: Cal/Train/Transbay Terminal Connection Follow-up

Dear Ms. Kugler:

This letter is to follow up our letter dated May 18, 2001 regarding a proposal which would require the closing of the Stillman Street parking lots between 2nd and 4th Streets. We are seeking full disclosure on your EIR with regards to air quality and to address our increased concern regarding new national reports, particularly one from the National Institute for Occupational Safety and Health (NIOSH) regarding the CARGINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST. The information in this report as well as others contend that exposure to diesel fumes should be reduced to the lowest feasible limits. We have also discovered that diesel exhaust contains more than 40 chemicals that are listed by the EPA as toxic air contaminants, known or probably human carginogens, reproductive toxins or endocrine disrupters. If the diesel fumes from the idling buses were sustained over any period of time, they would be potentially very dangerous to all residents and commercial tenants of our neighborhood. These are health risks that we cannot accept. We cannot allow a known carginogen to be introduced into an environment where we live and work every day.

We sincerely hope that you will explore every alternative to this proposal and take our concern very seriously. We are willing to work with you to find a viable solution and have already recommended several alternative locations which much less environmental impact.

Sincerely,

Francis Mathews

Cc: Bruce Barnes
Elizabeth Carney
Janice Mathews

Brokerage & Development 35 Stillman Street, Suite 300 San Francisco, CA 94107 (415) 957-0463 Fax (415) 957-0495

EPA: Diesel Fuel Exhaust Likely to Cause Cancer
03 Sep 2002 19:40 GMT

WASHINGTON (Reuters) - U.S. environmental regulators in a new report on Tuesday formally classified for the first time diesel exhaust from trucks and buses as likely to cause cancer in humans.

Green groups are seizing on the new report from the Environmental Protection Agency as proof the Bush administration needs to crack down on polluting diesel fuel emissions.

"This will underscore that diesel exhaust is a health hazard and should be controlled," said Frank O'Donnell at the Clean Air Trust, who called the report "the most in-depth health assessment to date" on diesel fumes.

Environmental groups are worried the Bush administration will roll back clean air regulations for diesel fuel.

The EPA in early 2001 issued standards to reduce diesel emissions from trucks and buses by more than 90 percent.

The administration said it backed those rules, but later said it might permit diesel engine makers to trade emission-reduction credits instead of producing cleaner trucks and buses.

The EPA is considering similar clean diesel standards for construction and farm equipment.

In addition to concluding that diesel fumes likely cause lung cancer, the EPA found diesel exhaust triggers asthma and other respiratory problems.

The agency said its report is based on exposure from diesel engines built prior to the mid 1990s. As new diesel engines with cleaner exhaust emissions replace existing engines, the report's conclusions will have to updated, it said.

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NIOSH ISSUES CANCER ALERT FOR DIESEL EXHAUST FUMES

One reason why people often oppose a new facility is increased truck traffic. Trucks are big and noisy and subject to accidents, and when accidents occur involving trucks, there's a high likelihood of fatalities.

However, the federal government has recently concluded officially that there is another good reason to be concerned about increased truck traffic in your neighborhood: five separate studies in the last 3 years have shown that diesel exhaust certainly causes cancer in laboratory animals, and two studies of railroad workers show that it causes cancer in humans as well. As a result of this determination, the National Institute for Occupational Safety and Health (NIOSH) has issued a special publication, CARCINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST, offering this recommendation: "As prudent public health policy, employers should assess the conditions under which workers may be exposed to diesel exhaust and reduce exposures to the lowest feasible limits." Citizens may reasonably ask: if NIOSH believes workers should not be exposed to diesel exhaust because of the cancer hazard, can health officials in other parts of government believe that the general public should continue to be exposed to diesel exhaust? Taken in this light, risk assessments that discuss only the traffic hazards associated with a facility are missing the major point: diesel trucks can evidently kill innocent people even if no traffic accidents occur.

Diesel engines are more efficient than gasoline engines; they produce more horsepower per gallon of fuel, and they use a less-refined (thus cheaper and more plentiful) fuel. When diesel fuel burns in an engine's combustion chamber, the resulting exhaust contains gases and particles (soot). The gases include nitric oxide, nitrogen dioxide, oxides of sulfur, and hydrocarbons (e.g., ethylene, formaldehyde, methane, benzene, phenol, 1,3 butadiene, acrolein, and polynuclear aromatic hydrocarbons [PAHs], several of which are known carcinogens). Of the particles in diesel exhaust, 95% are less than 1 micron in diameter and thus they are respirable, which is to say they are easily taken into the deepest portions of the human lung where they may lodge forever. The core of each particle is made up of pure carbon, but as many as 18,000 different chemicals from the gaseous portion of the exhaust may be adsorbed (attached) onto the carbon core, and thus diesel exhaust can carry a whole host of exotic, toxic and carcinogenic chemicals into the deepest portions of your lung-down in the region where the transfer of gas occurs to put oxygen into your blood stream and to take carbon dioxide out.

As recently as 1986, NIOSH concluded that diesel exhaust did not cause cancer in laboratory animals. However, in the period 1986-1988, five long-term animal studies, and two epidemiologic studies of humans, all concluded that exposure to diesel exhaust causes lung cancer. As a result, NIOSH reversed itself and in August, 1988, issued a special "current intelligence bulletin" to

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Environment

Diesel Fumes Mean Cancer for Thousands of Americans

By Cat Lazaroff

WASHINGTON, DC, March 15, 2000 (ENS) - More than 125,000 Americans may get cancer from breathing diesel fumes from buses, trucks and other diesel engines, says a new analysis by state and local clean air regulators. The officials are calling on the U.S. Environmental Protection Agency, which is planning to release new restrictions on sulfur in diesel fuel within two months, to take strong action to address this health risk.

Diesel vehicles are among the prime sources of the pollution that leads to smog (Two photos courtesy EPA)

The analysis, by the State and Territorial Air Pollution Program Administrators and Association of Local Air Pollution Control Officials (STAPPA and ALAPCO), comes as the oil industry seeks to kill a proposed EPA plan to clean up diesel buses, trucks and diesel fuel. The EPA proposal is still under review by the White House Office of Management and Budget.

Calling diesel emissions an important health hazard, the EPA has announced it will release a new rule by the end of April requiring sharp cuts in the amount of sulfur allowed in diesel fuel.

Diesel engines are significant contributors to air pollution. The hazardous mixture that comprises diesel exhaust contains hundreds of different chemical compounds that wreak havoc on air quality, playing a role in ozone formation, particulate matter, regional haze and acid rain.

Diesel exhaust contains more than 40 chemicals that are listed by

the EPA as toxic air contaminants, known or probably human carcinogens, reproductive toxins or endocrine disrupters.

Vehicle exhaust also contributes to acid rain, and can lead to illness in humans

"There is no pollution more disgusting than the thick, noxious, suffocating smoke that billows from trucks and buses," said Becker. "But even worse, these fumes are putting us at risk of cancer - risk that can be almost completely eliminated with modern pollution controls."

Last fall, the South Coast Air Quality Management District, which sets air standards for the Los Angeles, California region, released a report analyzing the cancer risk in the region from exposure to diesel particulates. The agency concluded that mobile sources are responsible for about 90 percent of the cancer risk in the area, and that 70 percent of the total cancer risk is attributable to diesel particulates.

That study prompted STAPPA and ALAPCO - the national associations of state and local air quality control officers in the states and territories and more than 165 metropolitan areas across the country - to extend the evaluation to other cities nationwide.

Among their results: Over a lifetime of exposure to diesel fumes, an estimated 119,570 people in metropolitan areas, and an additional 5,540 in suburban and rural areas, will develop cancer. Large cities, including Los Angeles, New York City and Chicago, Illinois, could see thousands of cancer cases each.

STAPPA and ALAPCO want the EPA to require trucks to operate as cleanly as current laws mandate
(Photo courtesy Daimler Chrysler Corp.)

STAPPA and ALAPCO have joined major health and environmental groups in urging EPA to issue tough new diesel standards. Among their recommendations, the groups said EPA should set an extremely strict national limit on the amount of sulfur in diesel fuel - capping sulfur at less than 15 parts per million - by no later than mid-2006. The groups also want an intermediate cap of 30 parts per million to take effect by 2004.

The EPA has not yet released any specific numbers that will be included in its new sulfur rule.

Sulfur is a poison for diesel pollution control devices, much as lead was a poison to catalytic converters in the 1970s. The groups noted that California recently set a diesel sulfur cap of 15 parts per million for urban buses that continue to use diesel fuel. The groups said the national standards should apply not only to truck and bus fuel, but also to fuel used in "nonroad" diesel engines, such as construction equipment.

Oil refiners warn that the technology does not yet exist to produce fuel clean enough to meet the groups' requirements. Developing such fuel would be prohibitively expensive and could drive some refiners out of business, warned the American Petroleum Institute (API), a trade group. But API and other groups have volunteered to reduce sulfur by 90 percent from its current cap of 500 parts per million, bringing the sulfur content of diesel down to 50 parts per million. That reduction could add five or six cents to the price of a gallon of diesel fuel, said API spokesperson Edward Murphy.

Oil refiners say dramatic cuts in sulfur could prove prohibitively costly (Photo courtesy North Atlantic Co.)

Officials from the National Petrochemical Refiners Association (NPRA) and Petroleum Marketers Association of America sent a letter Tuesday to EPA Administrator Carol Browner warning that sharp sulfur reductions could result in dramatic cost increases and an unreliable supply of diesel fuel and related products.

"EPA's proposal for diesel sulfur is likely to reduce the supply of diesel fuel as well as heating oil and even gasoline," the letter said. "It is our understanding that the EPA proposal calls for a reduction of the onroad diesel sulfur cap from 500 parts per million (ppm) to 15 ppm in 2006. The proposed cap and timeframe are in excess of what is feasible or advisable from either an energy supply or environmental standpoint."

STAPPA and ALAPCO also want the EPA to set tough standards for diesel soot and smog-forming nitrogen oxide emissions from new trucks and buses by 2007. Emissions could be reduced by at least 90 percent through use of low-sulfur fuel and advanced exhaust emission controls, they noted.

STAPPA and ALAPCO want emissions reductions for construction equipment as well

(Photo courtesy Nebraska Machinery Co.)

Equivalent emission standards should be set for construction equipment and other big nonroad diesel engines, the groups advised.

Big diesel trucks, buses and nonroad engines should be required to operate as cleanly in use as they are supposed to, the groups said. The groups noted that for more than a decade, seven of the biggest diesel engine makers installed illegal "cheater" devices on well over a million trucks, allowing them to pollute more on the road than in pre-sale tests. These same engine makers are now trying to weaken the Consent Decrees that were reached last year with EPA and the Justice Department to settle these environmental violations.

The Clinton administration is taking actions to reduce pollution from trucks and other large vehicles. The Department of Energy (DOE) announced earlier this month it will partner with the heavy duty vehicle industry in a $30 million to $50 million research project to develop cleaner and more fuel efficient trucks. Over the next five years, the joint research effort will help researchers develop more energy efficient trucks, ranging from pickup trucks/sport utility vehicles to eighteen wheelers. Seven teams from the industry will join the DOE to develop clean energy technologies that will make trucks cleaner, more fuel efficient, and promote the use of alternative fuels.

"The research partnerships between the federal government and the private sector are critical to reducing America's reliance on imported oil, maintaining economic viability of our industries, and improving air quality," said Energy Secretary Bill Richardson. "With projections indicating that trucks will use twice as much fuel as cars by 2020, it is critical that we look to improve fuel efficiency and clean energy technologies."

About $5 million will be awarded this fiscal year. Three teams will develop hybrid propulsion systems utilizing a natural gas engine an electric powertrain for buses and urban duty trucks, such as delivery vans and heavy-duty vehicles. The teams will match DOE funding dollar for dollar. Four other research teams from industry will develop advanced components to reduce the fuel consumption and emissions from truck diesel engines. Because these projects are considered more risky, these teams will spend $3 for every dollar granted by DOE.

Becker noted that dozens of human epidemiological studies have found a link between diesel soot and lung cancer. STAPPA/ALAPCO's nationwide cancer projection "is an extremely conservative figure," using a method similar to that used by regulators in California to estimate diesel-related cancers there, he noted.

"In fact, the actual number of cancers could easily be ten times higher," Becker said, adding that "the important thing to keep in mind is that we are facing a cancer risk - a risk we cannot avoid

unless EPA takes decisive action."

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get the word out that diesel fumes are dangerous. NIOSH estimates that 1.35 million American workers are routinely exposed to diesel exhausts.

Get: CARCINOGENIC EFFECTS OF EXPOSURE TO DIESEL EXHAUST [CURRENT INTELLIGENCE BULLETIN 50; DHHS (NIOSH) PUBLICATION NO. 88-116]. Cincinnati, OH: Division of Standards Development and Technology Transfer, NIOSH, Robert A. Taft Laboratories [4676 Columbia Parkway, Cincinnati, OH 45226], August, 1988; phone (513) 5338287. It's 30 pages and free.

--Peter Montague

October 25, 2002

MDC
PROPERTIES, INC.

Joan Kugler
AICP, EIR Project Manager
San Francisco Planning Department
1660 Mission Street; Suite 500
San Francisco, CA 94103-2414

HAND-DELIVERED TO:
30 Van Ness Avenue
4th Floor; Room 4150
San Francisco, CA

Re: Stillman and Perry Streets, proposed bus storage, and the EIR.

Dear Ms. Kugler,

I am hand delivering this letter, along with copies of our previous correspondence dated May 18, 2001 and September 30, 2002, and copies of studies which show significant impact and danger from diesel fumes. The EIR did not address this very important issue. We are already exposed to pollution of all kinds from the traffic on the approach to the Bay Bridge; buses idling and coming and going to and from a rather enclosed storage area under this unventilated approach would escalate the air and noise pollution to unacceptable levels. I am hoping that this will get your attention and that we will be able to halt all further forward motion on this proposal

I was quite dismayed to discover that not only did we not receive a copy of the EIR as requested, but in reviewing a Stillman Street neighbor's copy, Stillman and Perry Streets were completely absent, with the exception of a brief mention of noise pollution from the proposed bus storage. We raised these issues at the April 4, 2001, Scoping Meeting. Why weren't these issues evaluated in the EIR?

Although we are concerned with noise pollution, we are also greatly concerned with the impact of diesel fumes on air quality, the dissolution of all parking between 2nd and 4th Streets in the established lots. I think it is important to note, these parking lots were listed in the Pac Bell Ballpark EIR as important to that facility. Also the greatest concentration of commercial development, hence parking demand, is on Second Street. In conclusion we are concerned and suspicious of the desire to push through this proposal without exhausting other alternatives.

We have distributed petitions to our concerned friends and neighbors and these shall be returned to you as soon as all signatures are in. Letters are also forthcoming.

We look forward to seeing you at City Hall on November 12th.

Sincerely,

Francis Mathews

Brokerage & Development 35 Stillman Street, Suite 300 San Francisco, CA 94107 (415) 957-0463 Fax (415) 957-0495

LAW OFFICE OF ARTHUR L. MEADER, III
701 Pennsylvania Ave., Ste. 101 San Francisco, CA 94107 Phone: (415) 641-4880 Fax: (415) 641-4490

December 19, 2002

Joan Kugler
Planning Dept.
City and County of San Francisco
1660 Mission St., #500
San Francisco, CA 94103

Re: Transbay Terminal/Caltrain Downtown Extension/Redevelopment Project

Dear Ms. Kugler:

I am a resident at the Clocktower at 461 2nd Street, San Francisco, California. I have reviewed as best I can the EIR on the Transbay Terminal/Caltrain/Redevelopment project and offer the following comments.

I disagree strongly with the suggestion of a bus storage facility across the street from the Clocktower. Literally, it seems, hundreds of buses may be stored there. The EIR does not adequately address the issue of pollution (noise, fumes, particulate matter) that will result from these buses being stuffed under the freeway ramps in that area. Clocktower residents are not the only people living in the area: there are residences on Stillman and Harrison Streets, I believe, that would be affected as well.

Even more woefully inadequate is the discussion of resulting traffic problems which can be expected from ferrying buses to and from the new transbay terminal. Several of the intersections in the area are already "worse case scenario" at peak traffic times (see the EIR for the Giants' stadium and the EIR for some proposed high rises also in this same general area). I can tell you from firsthand experience that peak traffic times go well beyond typical rush hour scenarios now, including weekends. There are "horn concertos" many nights of the week already.

Other options for the buses would be much more appropriate. I suggest housing them at the transbay terminal itself or at some other location closer to the terminal (I know you don't want to take up space where other high rise buildings are likely to be proposed in the near future and that the honchos at Charles Schwab, Gap, etc. don't want the buses in their neck of their woods either–better to squeeze'em in with hapless homeowners).

Regarding the analysis of expected noise and vibration from running a huge tunnel right down Second Street, literally feet away from the Clocktower building, the EIR seems so far off base as to be from the world of science fiction and junk science. So unacceptable noise in the hallway is not the equivalent of unacceptable noise in the house? Even though this is all in the same building, it doesn't matter?

I'm sure you are aware of the fact that the Clocktower is already at Ground Zero for another huge construction project, viz., the re-do of the western approach to the Bay Bridge. Exactly where is the study showing what the cumulation of that and the proposed mega-project now before you (and the proposed three- and four-hundred foot towers just blocks away) will be? What happens when each EIR says such-and-such intersections are already at maximum traffic degradations but makes little or no reference to the combination of all these proposals?

Discussion in the EIR is totally lacking about what happens to access to the Clocktower garage when our block of Second Street is "closed" (this is not a "delivery entrance," as mentioned in the report).

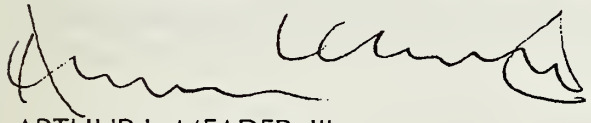
A few other comments, even though outside the purview of the EIR:

Where is the money coming from for this 2-billion dollar project (the state budget deficit currently looks to be over $30 billion and the federal deficit is soon to follow this steep, upward curve, what with war and tax cuts)?

How many people does Caltrain actually move and do the projections for increased ridership, even if to be believed, justify a project of this magnitude now?

I believe the EIR needs substantial work yet.

Very truly yours,



ARTHUR L. MEADER, III

RECEIVED
[illegible] 2002
PLANNING DEPT

Arthur L. Meader, III
461 2nd St., #T-455
San Francisco, CA 94107

November 22, 2002

To: Joan Kugler
AICP, DIR Project Manager
S.F. Planning Dept.
1660 Mission St., Ste. 500
San Francisco, CA 94103

Dear Ms. Kugler:

I am a resident at the Clocktower, near ground zero for the proposed TransBay terminal bus storage facility (2nd and Stillman Streets). To put it nicely, you've picked a lousy location, pretty much guaranteed to pour lots of diesel fumes and particulate matter into people's homes, not to mention the accompanying noise that can be expected. Someone's brain was not in gear when this plan was developed or have you not ever seen the chaotic traffic mess present in the area nearly every night (weekends not excluded but not quite as bad). If you want real problems, I suggest adding lots and lots of buses to the mix per your idea.

There should be plenty of areas actually closer to the Bay and to the proposed terminal where the buses can be housed. Let me guess: the Powers That Be didn't want these pollution-spillers in their backyard(s) so why not foist them off on hapless residents in the area (there are residents on Stillman and other parts of Second Street as well as Clocktower people that will be affected). I say why not nestle these babies right next to the Gap headquarters or under the Charles Schwab building. You won't convince me that those locations aren't as practical or more so than your apparent choice.

Thanks also for the extensive advance notification. At least with projects such as the Third Street rail line I get periodic mailers,which are very helpful. I have yet to hear peep one from your office or any other agency involved in this deal.

Please reconsider this ill-advised proposal.

Very truly yours,

ARTHUR L. MEADER, III

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November 24, 2002

Hand Delivery
Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

RE: Public Comment on Draft Environmental Impact Statement / Environment Impact Report for Transbay Terminal / Caltrain Extension / Redevelopment Project

Dear Mr. Maltzer:

This letter responds to Caltrain's letter of October 4, 2002, which (1) transmitted a copy of the Draft Environmental Impact Statement/Environmental Impact Report ("Draft Report") for the above referenced Transbay Terminal Project ("Project"), and (2) requested public comments on the Draft Report be directed to your attention. The following comments are submitted on behalf of a consortium of architects, engineers, urban planners and others (the "Consortium") interested in the successful development of the Project. As set forth in letters dated January 29 and February 1, 2002 (Attachments A and B), the Consortium submitted an alternative proposal ("Alternative") for the Project. Although the Consortium's proposal spelled out how the Alternative could save almost a billion dollars in construction cost and considerable time in completion of the Project, the Draft Report does not address the Alternative. As set forth below, the Draft Report's failure to evaluate this viable alternative is a breach of the federal and state environmental review requirements for the Project. Moreover, given the significance of the Project for San Francisco and the entire Bay Area, it is essential that all reasonable alternatives be reviewed. This is particularly important today because the unusually high cost of constructing and financing the Transbay Terminal as proposed in the Draft Report is likely to doom any prospect of completing this critical link in Bay Area transportation for many years to come.

AC Transit Dictated Site Selection

The present Transbay Terminal was built in the 1930's to handle commuter trains from the East Bay. The long narrow terminal with its sweeping ramp structure was designed to accommodate multi-car trains using elevated tracks for easy connection to the lower deck of the Bay Bridge. When trains were removed from the bridge in the late 1950's, AC Transit started bus service to the terminal using the same ramps and station platforms previously used by

commuter trains. AC Transit and other bus lines continued to use the terminal without significant alteration, but the 1989 Loma Prieta earthquake made it clear the aging terminal had to be replaced or substantially upgraded to meet modern seismic standards.

In the early 1990's the City and County of San Francisco and other public agencies studied several alternatives. With the help of a Citizens Advisory Committee, the Main/Beale site next to the present terminal was picked as the best location for a new terminal. On March 4, 1996 the San Francisco Board of Supervisors approved the Main/Beale site as the preferred alternative. Preliminary designs were prepared for a Main/Beale terminal but AC Transit was not happy with the initial layouts. AC Transit then sued the City contending that the Main/Beale site was not adequate for its purposes and that only the present terminal location should be considered. In order to settle this litigation, the Board of Supervisors passed a resolution in February 1999 that backed away from the Main/Beale site and urged the "City and County of San Francisco to work expeditiously with AC Transit...to retain AC Transit bus service at the current Transbay Terminal site." As a result, the Draft Report only considers rebuilding the terminal at its present location.

Penalties for Reusing Existing Site

Reuse of the existing site, with its long narrow footprint and extensive elevated ramp structure, creates several problems for design of the new Transbay Terminal. For example, to accommodate AC Transit and the other bus lines, the proposed terminal will be as large or larger than the current terminal (approximately 1300 feet long, 165 feet wide, and almost 100 feet tall) - the equivalent of the Empire State building laid on its side. Like the old terminal, the new terminal will stretch over three major streets (and several alleys), blocking view corridors north and south, and together with connecting ramps dominate the surrounding neighborhood as much or more than the existing terminal. To counter the enormous scale of the new terminal, the exterior is designed as a largely transparent glass cage set in a steel frame. This high tech effort to create an attractive presence for the new terminal may be successful, but is likely to be substantially more expensive than a standard building exterior.

Furthermore, the long narrow configuration of the terminal is inherently less efficient than a more square-shaped building. First, interior corridors must be added so passenger can get from one end of the terminal to the other –in this case an entire floor (the Concourse Level) is used as a pedestrian walkway connecting the ends of the bus terminal, and a second floor below ground (the Train Mezzanine Level) serves a similar function for train passengers. Transit buildings typically have more efficient centralized circulation areas where passengers walk fewer steps to get to their train or bus. Second, long narrow buildings are inherently less efficient because they have a much higher ratio of exterior surface to interior floor space. The proposed terminal would have a perimeter of almost 3000 feet with floors of approximately 215,000 square feet. By comparison a building which is 400 by 600 feet has a perimeter of only 2000

feet but provides 240,000 square feet of space on each floor. In this example, the proposed Transbay Terminal is approximately 60% less efficient than the more compact terminal in terms of the interior floor space created per foot of exterior wall. This of course leads to large differences in construction cost per square foot, particularly in this case where the proposed exterior wall treatment is very expensive.

The existing site is also a difficult place to put a rail terminal. At a width of 165 feet, the new terminal will accommodate only six train platforms. Moreover, the terminal can only be accessed on tight 500-foot radius curves and does not have room for straight platforms in excess of approximately 1000 feet. This presents problems for California's High Speed Rail Authority which has requested tracks with a radius of at least 650 feet on all curves and station platforms at least 1300 feet in length. The proposed terminal site is at best a marginal fit for high-speed rail, and clearly provides no expansion space for new rail service from the East Bay and beyond. As the Draft Report indicates, in the long run the large majority of terminal patrons will be train riders, especially when rail service to the East Bay becomes available. Unfortunately, the proposed design calls for an enormous investment in facilities for bus riders and comparatively little investment for rail passengers.

Finally, reusing the old terminal site adversely impacts the Project's development prospects. The old terminal site along Mission street has the highest development potential because height limits in that area are 400 to 500 feet providing the greatest density and value for development. However, the proposed terminal design precludes most development along Mission Street. Instead, the Draft Report proposes a substantial change in San Francisco's zoning, moving high rise development two blocks south along Folsom Street:

> "[The Project] would change the zoning ... to allow for development of greater heights – up to a maximum of 400 feet on the north side of Folsom Street – 200 feet higher than is currently permitted." (Report, p 5-97).

It is unclear whether the City would allow this rezoning because to do so would permanently change the character of the neighborhood along Folsom Street. Without it, however, redevelopment would generate considerably less money to pay for the terminal.

Advantages of Main/Beale Site

The City and the Citizens Advisory Committee originally chose the Main/Beale site because it has several important advantages. One of the most obvious is that it is a largely vacant site on which a new terminal can be quickly constructed while the old terminal stays in operation. This eliminates the need to build a temporary terminal and ramp for use while the old terminal is torn down and rebuilt, thereby saving considerable time and tens of millions of dollars in construction cost. Most important, it is an efficient site on which to locate a new

terminal because of the larger, almost square blocks between Main and Beale and Folsom and Mission. At 300+ feet in width, the site can accommodate up to 10 train platforms, including two 1300-foot long platforms required by high-speed rail with no sharp curves in the approaching track. It is closer to the Embarcadero Bart/Muni Station, making an underground pedestrian connection between the terminal and Bart/Muni feasible. Because of its North/South alignment the Main/Beale site requires shorter, less costly ramps to connect buses to the Bay Bridge, and a shorter tunnel connection for Caltrain. Finally, the Main/Beale site maximizes development along Mission Street as called for by the City's Master Plan, and retains existing zoning along Folsom Street. Further details of the Main/Beale Alternative are provided in Attachment C.

One and a Half Billion Dollars in Savings

The Draft Report estimates the Transbay Terminal Project will cost approximately two billion dollars to construct and another billion to finance, or three billion dollars total. The Alternative is estimated to cost somewhat more than a billion dollars to construct, and perhaps another half billion to finance for a total cost of just over one and a half billion dollars. It is easy to see where the savings are:

1. The Alternative avoids approximately $30 million in construction cost by eliminating the temporary terminal and ramps.

2. Permanent ramps for the Alternative design are much shorter and simpler, saving $100 to $200 million, depending on which ramp design is selected for the proposed terminal at the existing site.

3. The Alternative terminal is much more compact, reducing exterior size while preserving usable space within the building. Moreover, because the Alternative design has a smaller impact on the neighborhood (only a pedestrian bridge crosses one major street) there is less need for an expensive façade treatment. As a result, as much as $300 million can be saved in constructing the terminal building.

4. Caltrain's connection to the terminal is shorter and easier, reducing costs for the rail portion of the project by approximately $200 million.

5. The Alternative design allows development of more valuable land along Mission Street, increasing the project's total revenues by some $50 million.

Finally, financing costs for the Alternative are greatly reduced, not only because construction costs are much lower to start with, but also because revenues would be available from development and other sources to pay approximately half these costs at the time of construction. As a result the total debt to be financed would be closer to half a billion dollars

under the Alternative, versus a billion and a half-dollars under the project as proposed in the Draft Report.

Limited Funds Available

The higher cost of the terminal proposed in the Draft Report might be ignored if funds were readily available for the Project. However, just the opposite is true. As acknowledged in the Draft Report, a final financing plan cannot be offered at this time because sufficient sources of funding cannot be identified. The Draft Report suggests that future revenue sources may develop at state and local levels, but these are dependent on factors beyond the Project's control. The Draft Report also proposes to pay approximately twenty percent of total costs through Passenger Facility Charges (PFC's) of $2 to $3 per day collected from each commuter using the terminal - a novel concept for a local transit project - which would increase by fifty percent commute costs for a typical AC Transit rider. Finally, the Draft Report suggests approximately $600 million could be borrowed from the federal government under its TIFIA loan program, but it is unclear what additional source would be used to repay the TIFIA loan. In summary, the level of available funding is adequate for the Alternative but not for the three billion dollar project proposed in the Draft Report.

Conclusion

AC Transit's position is that it likes the current Transbay Terminal and sees no urgent need for change, except for a seismic upgrade to be paid for by the State. If forced to move, AC Transit will only approve a new facility that meets all its demands regardless of cost - a Taj Mahal for buses. The result is an enormous white elephant that is neither functional nor financeable, which is perhaps the outcome intended by AC Transit from the outset. Fortunately, the environmental review laws that apply to the Project do not permit AC Transit to play dog-in-the-manger and frighten away competing alternatives with lawsuits and similar behavior. Instead, federal and state regulations require the consideration of all viable alternatives as a precondition to project approval. We therefore request the Alternative be fully evaluated prior to completion of the final Environmental Impact Statement/Environmental Impact Report for the Project.

Sincerely,

Oliver L. Holmes

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Public Relations and Public Affairs

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415.788.7788 | fax 415.788.7858
www.solem.com | solem@solem.com

January 29, 2002

Marie Pang
Engineer
Peninsula Corridor Joint Powers Board
1250 San Carlos Avenue
San Carlos, CA 94070-1306

Dear Marie,

It was good to talk with you briefly by phone today. I'm glad you have had a chance to look at the booklet about the New Alternative for replacing the Transbay Terminal which we sent you last week.

If you have any questions, please feel free to give me a call.

Sincerely,

Jonathan Kaufman
Executive Vice President
Corporate Affairs

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San Francisco, CA 94108
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www.solem.com | solem@solem.com

February 1, 2002

Mr. Jerome Wiggins
Transit Planner
Federal Transit Administration
201 Mission Street, Suite 2210
San Francisco, CA 94105

Dear Jerome,

It was good to talk with you briefly by phone today. I'm glad you received the booklet about the New Alternative for replacing the Transbay Terminal which we sent you last week.

If you have any questions, please feel free to give me a call.

Sincerely,

Jonathan Kaufman
Executive Vice President
Corporate Affairs

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December 6, 2002

VIA HAND DELIVERY

Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

RE: Public Comment on Draft Environmental Impact Statement / Environment Impact Report for Transbay Terminal / Caltrain Extension / Redevelopment Project
NOTICE OF CHANGE OF ADDRESS

Dear Mr. Maltzer:

On November 26, 2002, this office filed public comments on the above reference project with your office. This letter will serve as formal notification of a change of address for our office. Any future correspondence with regard to the Transbay Terminal Project or our public comments should be directed to my attention at:

Duane Morris LLP
One Market, Spear Tower, Suite 2000
San Francisco, CA 94105-1104

Sincerely,

Oliver L. Holmes

OLH/psb
SF\35721.1

Matthew Morrison

246 Second Street #902
San Francisco, CA 94105

RECEIVED
DEPT

Paul Maltzer, EIR officer
SF Planning Dept.
1660 Mission Street #500
San Francisco, 94103-2414

Mr. Maltzer,

I am a resident of 246 Second Street in San Francisco, and would like to make some comments on then draft EIR for the Transbay Terminal/CalTrain downtown Extension/Redevelopment Project.

I have lived on Second Street for 2 years, and I believe this project will bring many benefits to the area. However, I would like to make the following comments:

- Please be aware that although there are many businesses in the area, there are also a number of residents. Too often in the past, construction projects have been given permission to operate at night, unaware that there are people living in the area. As the project progresses, I hope you'll keep in mind that this is a mixed-use neighborhood, and that people live here.
- I am concerned at the large number of buildings that will be demolished for this project. One of the attractive aspects of the SOMA area is the number of historic and interesting buildings built on a human scale. I am particularly thinking of Second Street between Mission and Folsom. I hope we can keep the demolition to a minimum, as I'm afraid that if these building are destroyed, they will be replaced by large, ungainly, and uninteresting buildings whose only purpose is to maximize the profit for the developer.
- I hope the possibility of tunneling is explored as much as possible, as I believe it will significantly lessen the impact to the neighborhood.
- I hope you'll reconsider the location of one of the staging areas from Howard and Second. That is only half a block from 246 Second Street, and the noise, especially at night, will be extremely disruptive.
- In section 5.21.10.1, there is a mention of noise measurements done at our building, which recorded a reading of 57dBa. However, this measurement was taken during evening rush hour—perhaps the noisiest time of day. At night the area is much quieter, and I hope a more accurate measurement of the noise levels will be taken and used as the basis for enforcing the noise ordinance.
- Figure 5.2-3 illustrates (by red shading) buildings scheduled to be demolished by the construction. This figure seems to indicate many more buildings slated for demolition than is indicated in the text. I hope that can be minimized.
- If it is necessary to close Second street to all traffic, I hope there will be provisions made to provide parking to the residents who will not have access to their parking garage. This will be a major inconvience.
- There are a number of mentions of daily cleanup (such as watering down the dust and cleaning up contraction debris). However, a construction project of this size will greatly impact the buildings nearby, and I hope there is some provision for a through power washing and or painting of 246 Second after the project is completed, as I am sure its appearance will be adversely affected by the construction dirt and debris.
- I understand that state-of-art building techniques will be used. However, I am concerned that all the digging and impact so near our building may weaken its foundation and potentially cause some problems during an earthquake. I hope the city is fully aware of the

risks and is ready to mitigate any possible problems caused by the construction to the structural integrity of 246 Second Street.

As the project progresses, I am sure there will be a number of issues that will arise. I sincerely hope that we can work together to make this project a success and that you will be sensitive the needs and concerns of the people who make this neighborhood their home.

Sincerely,

Matthew Morrison

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Patrick Moyroud
P.O. Box 225068
San Francisco, CA. 94122 USA
415/731-0911 Fax 731-6451
pjmoy@attglobal.net

6 December 2002

Mr. Paul Meltzer
San Francisco Planning Dept.
1660 Mission St. Suite 500
San Francisco, CA. 94103

Subject: public comment, Transbay Terminal reconstruction

Dear Mr. Meltzer:

I am writing in response to the proposed redesign of the Transbay Terminal for use as a combined commuter rail and high-speed rail station. While the overall design is beautiful and efficient, I am very concerned about the rail capacity limits imposed by the unusually small number of tracks proposed (six) within or beneath the terminal. If you look at any major multi-modal rail station, in the USA or in Europe, you will see a much greater number of tracks to accommodate the frequent service required of such a facility. Even in San Francisco today, the existing Caltrain terminal has ten tracks, just to handle one commuter rail line and a few special trains. Major terminals that handle high-speed and commuter rail traffic, such as Washington Union Station and Paris Montparnasse Station, have *two or three times* as many tracks that are in heavy use from early in the morning until late at night. I do not see how the current proposed Transbay Terminal design could accommodate the kind of frequent arrivals and departures expected when the high-speed rail service begins.

The potential for congestion is increased by the fact that the proposed tracks will be underground. Mechanical breakdowns or accidents, no matter how slight, are likely to shut down tunnels and create serious disruptions. For example: anyone who has lived in San Francisco for more than a few years can tell you what a major error it was to build a two-track "stub-end" underground terminal at the Embarcadero Muni Metro station. Every weekday trains would back up in the tunnels, creating massive delays. When a breakdown occurred, the entire system was gravely affected. This problem was only solved when, 17 years later, a multi-track turnaround was constructed beneath the Embarcadero roadway. No one wants to see such an expensive error repeated in the new Transbay Terminal. I hope you agree.

Sincerely yours,

Patrick Moyroud

Patrick & Co.

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Corporate Headquarters:
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December 16, 2002

PAUL E. MALTZER, ENVIRONMENTAL REVIEW OFFICER
SAN FRANCISCO PLANNING DEPARTMENT
1660 MISSION STREET. SUITE 500
SAN FRANCISCO, CALIFORNIA 94103

Ref: DRAFT ENVIRONMENTAL IMPACT STATEMENT/DRAFT ENVIRONNMENTAL IMPACT REPORT/SECTION 4(F) EVALUATION (DEIS/DEIR) FOR THE TRANSBAY TERMINAL/CALTRAIN DOWNTOWN EXTENSION/REDEVELOPMENT PROJECT

Dear Sir:

The following are comments I ask the Environmental Review Officer to look at and respond to concerning the subject EIR:

1. **The CalTrain Extension (Section 5.2) calls for an analysis of a two switch or three switch approach into the new Transbay Terminal. The Three Switch approach requires the taking of considerably more property and much more cut and fill. This alternative seems to be a poor one and will cost considerably more. Why is it being considered as a viable alternative?**

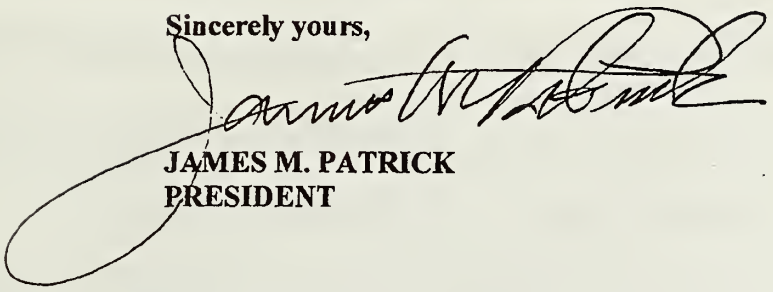
2. **The CalTrain Extension (Section 5.2) calls for the taking of 90 Natoma Street, Block 3721 number 47 for both the two and three switch alternatives. The taking of 90 Natoma appears to be not necessary relative to the Two Switch approach. Are we being too aggressive in our assumptions here?**

3. **I found no plans for any use of the properties that were acquired and demolished once the project was completed. Has any consideration been given to parks and/or public areas or will the land be sold to the highest bidder?**

4. **How likely is this project to be funded given the current State of California funding crisis?**

Thank your for your consideration.

Sincerely yours,



JAMES M. PATRICK
PRESIDENT

Paul Maltzer, EIR officer
SF Planning Dept.
1660 Mission Street #500
San Francisco, 94103-2414

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Dear Mr. Maltzer & SF Planning Dept.,

I am a resident and owner at 246 2nd Street. I am writing to voice important concerns about the Transbay Terminal Project.

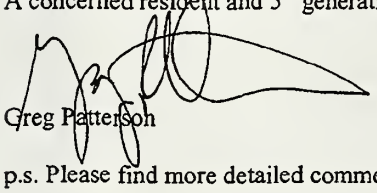
I am not opposed to improving the Transbay Terminal. What needs to be heard loud and clear, however, is that the proposed project area and changes (as well as the construction process itself) will affect not just business, but the increasing number of currently overlooked San Francisco residents in that same area. Also critical is the character, historical buildings, and quality of life for this growing residential area.

There are many areas of the EIR that are not clear, and it doesn't specify or limit the kind of development and changes in several cases. This is very concerning, given the potential change to the entire development area, and the influence and political power of large developers whose interests are not necessarily in line with those of the city or its residents.

There are, however, some areas of the EIR that are clear and pose a threat to the history and character of the city. As it stands, many of the historical buildings on the north-west side of Howard Street at 2nd street would be demolished (and possibly replaced with parking structures). Once torn down, historical buildings will not come back, and an important character and personality of the city will be lost. This is our neighborhood, and part of San Francisco's unique character will be lost through these demolitions. Similarly, once built, the Transbay Terminal will stay for many years, so should be designed with the long-term character of the city in mind.

There must be designs and development plans that will only enhance the city, rather than hurt its historical buildings, character and residential neighborhoods.

Sincerely,
A concerned resident and 5th generation San Franciscan,



Greg Patterson

p.s. Please find more detailed comments attached.

Urban Design. The publication of this EIR/S is premature in a number of areas. Only the Caltrain Extension project is sufficiently realized and well developed at this time to warrant publication and comment in this EIR/S. However, impacts associated with the design of the Terminal and the design of the many buildings that will be constructed in the proposed Redevelopment Area which surrounds it are difficult to analyze since there is so little information available at this time.

The Terminal design shown is apparently just a schematic possibility and not a real design. Urban Design impacts are impossible to assess since the schematic shown was developed specifically for preliminary study and the architecture shown is apparently conjectural. Have Guidelines been developed to assist the eventual project architect? Will there be a signature style of architecture for the Terminal that is in any way similar to what is suggested by the sketches in Figure 5.16-1?

Redevelopment Area zoning and height and bulk limits would be widely different in the Full Build and the Reduced Scope scenarios making the impacts difficult to determine (see p. S-8 and Figure S-2 opposite). Furthermore, in a Redevelopment Area, the zoning and height-and-bulk limits can all be superseded. Since the Redevelopment Area has not yet been instituted, so even the boundaries of it as stated in the EIR/S might not be fixed. The City's Master Plan and Urban Design Plan are barely acknowledged in this document.

Guidelines must be developed to guide the long-term efforts of architects and developers over the many years that the numerous sites within this Redevelopment Area will be under construction. A public process must guide the preparation of these Guidelines. Paramount among the issues that must be addressed in the Guidelines are: reuse of historic fabric and contextual treatment of new buildings when they are juxtaposed with older buildings. The EIR/S does not indicate whether Guidelines will be developed.

With so little specificity regarding the Redevelopment Area in the EIR/S, what is shown as a design concept in Figure 5.16-4 on p. 5-101 and Figure 5.16-5 on p. 5-102 is misleading in this official document. These drawings were apparently developed for another project and have nothing to do with this Redevelopment Area about which so little is known. Placing these computer visualizations in this EIR/S document gives the false impression that considerable planning has gone into the guidelines for the Redevelopment Area. These drawings should be removed from the document. It should be acknowledged that so little is known at this time about the Redevelopment Area that the treatment of it in this document is inadequate even for consideration as Program EIR. A complete EIR for the Redevelopment Area should be produced as a separate, later document, or possibly a Supplemental EIR, that is recirculated for public comment, when the planning has evolved and can be studied. The chart of proposed square footages mounted on a faded, microscopic, unreadable block diagram (Figure S-2 on p. S-9) makes the Redevelopment even more unknowable. Acceptance of this document's treatment of the Redevelopment Area in this EIR/S as an adequate environmental evaluation under CEQA could be readily challenged.

Historic Fabric. In the three historic districts that are affected by the layout of the rail lines, **a number of buildings which contribute greatly to these districts would be demolished under the cut-and-cover alternative.** Even under the tunneling alternative, **a number of buildings at the corner of Second Street and Howard Street would be lost.** The geologic study, which would reveal whether tunneling is not only possible but economically feasible, is not yet complete. It may be argued that it is not possible to support structurally a tunnel under the Second and Howard corner since the tracks here would have to cover a wider area in order to accommodate rail track-switching.

However, an alternative route underground should be studied to see whether it is possible to alter the tunnel alternative slightly in order to save more of the historic resources at Second and Howard. See the example provided (Mylnarik) which shows a fine-tuning of the route at this corner in order to preserve more of the threatened buildings. In any case, a strategy could be developed to remove the subject buildings or parts of them. For historic integrity of the buildings in these districts, the front facades of the threatened buildings could remain propped and stabilized in place while the tunneling is going on, and reconstructed afterwards. In this scenario, only those parts of buildings which must be removed would be removed.

The more difficult, and less desirable, solution would be to have the three contributory buildings at Second and Howard relocated during construction and then moved back. The EIR/S states that this could be done if a place were found to put the structures. The preservation of all the threatened buildings should be required to be listed as a mitigation measure for the consideration of the decision makers and sites for temporary location should be found.

Some of the historic resources are well described (Chapter Five, pp.5-71 to 5-91) but curiously the present TransbayTerminal Building is not shown graphically or described in this section.

Graphic Description of the Project. The route of the Caltrain Downtown Extension rail layout through the city (Figures 2.2-9 through 2.2-17) is shown in nine separate maps, each of which has a different compass orientation and none of which has a North arrow. One overall location map should have been shown in smaller scale as a key to the position of each of these map sections. The only guidance one has is the "match lines". Street names are absent and have to be supplied using an automobile route map from one's glove compartment. This reader had to have Figures 2.2-9 through 2.2-17 xeroxed and then pasted together the map segments along the match lines, resulting in a snake-like collage of angled map juxtapositions that can only be folded by an origami artist. While acknowledging that this project is a complex one extending over many blocks, there are better means of presentation to make it legible for readers.

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1624 Trona Way
San Jose, CA 95125

(408) 265-3281
mikeroth@svpal.org

December 19, 2002

Comments re:
Transbay Terminal/Caltrain Extension/Redevelopment Draft EIS/EIR

Paul Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Dear Mr. Maltzer,

The Draft EIS/EIR provides a comprehensive view of the project, project alternatives, why it is needed, its overall potential scope, impacts, benefits and costs. The initiating item, as made clear in the document, was the seismic problems of the existing Transbay Terminal and need to replace it with an earthquate-safe terminal. I commend staff of all agencies involved in this project for recognizing, early-on, the opportunity this provided to expand the project scope to include both redevelopment of the surrounding area and extension of Caltrain into a new terminal be built to accommodate its operation.

The need to replace the current terminal is clear and the opportunity to redevelop the surrounding area should be done where feasible, under either of the "Build" alternatives. However, I believe the Caltrain extension into the terminal should be eliminated from the planning process for the following reasons:

(1) such proposed extension, estimated to cost in the $800 million range, is far too costly for the potential ridership gain involved.

(2) the severe funding difficulties in the current economic environment, likely to continue indefinitely, will work against the Caltrain extension proposal and probably keep it from being funded, especially considering its weak economic features and more financially-attractive and cost-effective aspects of competing projects. The current official state budget shortfall, more than $34 billion, will result in severe state funding cutbacks for proposed transportation projects and there are Federal cutbacks to also be considered. Therefore, the Caltrain extension component should be dropped so the terminal replacement and area redevelopment aspects of the proposal would not be hindered by failure to secure funding for the Caltrain extension component.

(3) other potentially greater cost-effective approaches benefiting both Caltrain and MUNI Metro riders are either available now, or potentially available, and they can be implemented more quickly and should be developed.

(4) the extension puts all the burden to seek funding and build the Caltrain extension on the project partners (San Francisco Planning Department, the San Francisco Redevelopment Agency, and the Peninsula Rail Joint Powers Board), though it will be designed to allow High Speed Rail trains reach downtown San Francisco. This "piggy-backing" on these three agencies' efforts to reach downtown San Francisco, without itself seeking, obtaining and constructing its own downtown access, is unfair and unethical, and works to divert costs that otherwise should be borne by the California High Speed Rail Authority. (In fact, its own web site, regarding funding and building the system, assumes 15% of the right-of-way is in public ownership and *"will be provided to the system at no cost. This cost avoidance amounts to between $373.5 and $499 million".*) High speed rail should bear its own construction costs.

What is the funding situation of current Caltrain and MuniMetro projects?

(1) Regarding Caltrain, the DEIS/DEIR notes that Caltrain electrification is based on the assumption that the line will be electrified and new electric powered rolling stock will be purchased. It notes that should electrification not proceed, dual-mode diesel-electric locomotives would need to be purchased and the cost, estimated to be $235 million, added to the Downtown Extension component of the Transbay Terminal project. Peninsula Corridor Joint Powers Board draft minutes, for the October 31, 2002 meeting, notes that the funding availability is what is driving the electrification project and without money, there is no way the project could move ahead. In that event, I do not believe spending $235 million for the alternative approach, buying dual-mode engines, is either wise or feasible. I certainly do not believe it should be made a part of the Transbay Terminal project scope and its cost borne by the overall project.

(2) Regarding the MuniMetro, state money, if not cut due to the budget shortfall, should allow the design phase of the northern (Central Subway) portion of the 3rd Street light rail line to be completed. However, there is no funding for its construction, estimated, in 1997, to cost $750 million. In current dollars, the figure would be even higher.

What can be done? In place the highly-cost-ineffective Caltrain downtown extension proposal, there are some cost-effective approaches that should be investigated, and design proposals and cost estimates prepared for. The costs for some are almost negligible, compared with the proposed $800 million cost range for the Caltrain extension. I recommend the following be studied:

(1) Construct a covered pedestrian bridge over (or a pedestrian tunnel under) the westbound King Street traffic lanes, to provide a direct connection between the existing Caltrain 4th and King Street terminal and the MuniMetro 4th Street station. This would not only allow riders to go from one system to the other without needing to wait at red traffic lights at that intersection to turn green but also provide protect them from inclement weathe. It should attract additional riders to Caltrain and the MuniMetro extension along the Embarcadero and into the Market Street subway.

(2) Give MuniMetro trains on the surface extension to the 4th Street station complete traffic signal pre-emtion capability, i.e., have all signals turn green along the route whenever a MuniMetro train approaches in either direction. This will speed up the time it takes for riders to get from Market Street to the Caltrain terminal. It should attract yet more riders to Caltrain and the MuniMetro extension along the Embarcadero and into the Market Street subway.

(3) Increase the frequency of MuniMetro trains between the Market Street subway and the Embarcadero and the Caltrain terminal, as warranted by increased ridership.

(4) Develop a joint design of the Central Subway portion of the 3rd Street light rail line to include Caltrain single level electric trains, that could run directly into it from the peninsula. Multiple use of this subway would result in shared costs between Muni and the JPB, resulting in lower costs for both agencies and make it easier to secure funding to build it, as it would become a more cost-effective project with the multiple use I propose. Caltrain would need to be equipped with new single-level diesel-electric motive unit (D/EMU) equipment compatible with the tunnel infrastructure. Being standard gauge, it could possible share common trackage with the MuniMetro trains, or it could be built with separate tracks on its own level, as part of a single construction project. This would be similar to the Market Street Subway, where the two levels housing MuniMetro and BART tracks, and common stations and mezzanines, were built in a single cost-effective project. The new Caltrain D/EMU equipment would run using overhead electric line when in the Central Subway, and would run using the on-board diesel engines (generating electricity to power the wheel motors) when on the existing Caltrain right-of-way between San Francisco and San Jose. Should that line get electrified, this equipment would then get power from the overhead electric line and continue to be used. This would be a more cost-effective solution, when compared with the DEIR/EIS proposal to buy a new set of electric engines for Caltrains, needed to access the Transbay Terminal, costing $235 million. With joint use of the Central Subway and enhanced attractiveness of the MuniMetro surface extension into the Market Street subway, Caltrain riders will have two cost-effective ways to get downtown.

Sincerely,

Michael Rothenberg

Michael Rothenberg

CLARUS CONSULTING LLC

October 24, 2002

Joan Kugler
AICP, EIR Project Manager
San Francisco Planning Development
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Dear Joan:

I am writing to express my strong opposition to the proposed bus storage in parking lots between 2nd and 4th streets running along Stillman Street.

The diminished air quality and increased noise that would come as a result of bus storage would render this area uninhabitable for businesses and residential tenants alike.

Sincerely,

Art Wagner
President

35 Stillman Street, Suite 203, San Francisco, CA 94107 • Ph: 415.896.5110 • Fax: 415.896.2367 • art@clarusconsulting.com

Francis Wong
P.O. Box 1411
Mountain View CA 94042-1411

November 22, 2002

Paul Maltzer, Environmental Review Officer
San Francisco Planning Department
1660 Mission St Ste 500
San Francisco CA 94103

Sir, these are my comments for the DEIS/DEIR for the Transbay Terminal & Caltrain Downtown Extension Redevelopment Project.

Para S.7. Concur, except that I prefer the Second to Mission option;
and the Market to Mission pedestrian tunnel build or no build should be in the Superior Alternative statement. This tunnel should be built as part of the initial construction.

Para 2.2.2 and page 2-26, 2-27. The two track segment between station 41 and station 70 must be widened to three or four tracks to match the design on both ends of this segment. This intentional choke point imposes permanent severe operational limitations and prevents any flexibility to adapt to mechanical or other breakdowns. This creates congestion that completely negates any capacity improvements in the terminal or the first ten miles south. The benefit of the four track Townsend Street station cannot be exploited since the crossovers at station 44 do not provide adequate signal separation to expedite a following outbound train. On the inbound route, reducing the 4th track at station 40 is an impractical design, since any train waiting at the platform will foul the overtaking movement.

Page 2-33. By adjusting platform spacing, the two platforms angled toward Mission could be fully functional island platforms serving two tracks each and providing needed separation of Caltrain Regional Rail from Amtrak and HSR (High Speed Rail) trains. Since the ticketing, loading, provisioning, and pre trip servicing requirements are different between short and long distance trains, separate platform areas, and their comparable passenger mezzanines above, would encourage smooth passenger flow within the terminal.

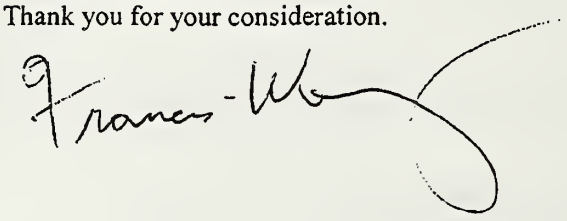
The 2nd to Mission option affords a direct high speed connection to any projected new transbay tunnel for HSR and Capital Corridor trains to Oakland, Sacramento, and east. While a new tunnel could connect to the Main Street option, it entails sharp curves and extended low speed approaches that negate the benefits of HSR.

Page 3-23. The California rail plan envisions conventional long distance passenger trains between San Francisco and Los Angeles under the Amtrak California brand by the end of 2004. It is logical that these trains would originate and terminate from the Transbay Terminal after it opens.

Page 5-113. If a diamond lane is established on both Beale and Fremont, surface rail connection should be provided from Market Street for E and F line tripper service at the Transbay Terminal. This would share use of 600 volt trolley with Muni lines 5 and 6. The incorporation of heritage trolley service at the Transbay Terminal provides both a historic link and practical direct connection to the Waterfront for both daily commuters and off peak tourists.

Page 5-118. This tunnel would be a catalyst not only for the one block Fremont Street corridor between the Transbay Terminal and Market Street, but then the area adjoining the perimeter of the Embarcadero station mezzanine concourse. A comfortable climate controlled passageway from work to transit would extend from First and Folsom to Market and Drumm. The pedestrian count for this tunnel underestimates the potential uses and benefits for the redevelopment area.

Thank you for your consideration.



GEORGE YAMAS

585 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105
415/908-1290
FAX: 415/908-1292

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Via Fax & U.S. Mail
Paul E. Maltzer
Environmental Review Officer
San Francisco Planning Department
1660 Mission Street #500
San Francisco, CA 94103-2414
Fax: 558-5991

December 11, 2002

Re: Caltrans & Transbay Terminal Project / Objection To Proposed Bus Storage At Stillman Street Area Between Second & Fourth Streets

Dear Planning Commission:

This letter is a follow-up to my oral objection on the referenced subject at the Planning Commission's 11/26/02 hearing.

I am the Managing General Partner and majority owner of a commercial building at 51 through 53 Stillman Street in San Francisco. My partners and I have owned this building since 1977 and have watched the neighborhood develop into a true mixed-use area where millions upon millions of dollars have recently been invested in both upgrading existing buildings as well as new development into retail, residential and commercial uses. The new proposed rezoning plans all call for more residential use in this area which seems consistent with the general location and overall quality of living this area offers.

Obviously, the permanent parking of hundreds of buses in the middle of this mixed –use area has significant negative impact on it and is totally incompatible with its current and proposed future uses due to noise, health-safety issues, traffic, parking, and other reasons already stated by other owners.

One can argue back and forth as to just how damaging the exhaust fumes are to the local residents and tenants but no one can seriously argue that the relocation of the buses to this area does not seriously diminish the quality of life for the tenants and residents as well as negatively impacting property values. To illustrate my point please imagine this bus storage facility was being relocated in front of your place of residence. What would be the day to day impact on your quality of life? If you own your residence how do you expect it would affect the long-term value of your home?

The impact is so negative that those affected have no choice but to oppose this relocation by any and every means they have, including litigation.

Clearly, the developers of the new projects making the bus relocation necessary have or, should have the burden of finding a lower impact site for the buses. Their responsibility for the impact of their project on other property owners seems clear and is similar to well established shaping or view-blocking issues where the party causing the negative impact is responsible to compensate the affected parties.

My suggestion is to urge any approval of the subject project's be conditioned upon the new project's developers finding a less dense, more suitable and less controversial site for their buses to be relocated on.

Staying with the current site is a lose-lose situation for everybody. The City loses property tax values, one of its' most successful mixed-use areas as well as excellent future residential sites where residents can truly walk to most work places. The locals lose their quality of life and investment value. Lastly, the developers of the sites surrounding the Transbay Project are likely to be delayed needlessly as those opposed to this bus relocation fight it. Why put unnecessary obstacles on a project that appears to be good for the City? Doesn't it make sense to help the project by eliminating this serious flaw as soon as possible?

Thank you for your consideration.

Sincerely,

George Yamas
Managing General Partner
George Yamas & Lorilane

TO ALL PLANNING COMMISSIONERS by fax

IX. Public Meeting Transcripts

CERTIFIED COPY

REDEVELOPMENT AGENCY

OF THE CITY AND COUNTY OF SAN FRANCISCO

PUBLIC MEETING)
CALTRAIN / TRANSBAY TERMINAL)
)

Public Meeting

November 12, 2002

Cathryn Bauer
CSR 12676
106847

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REDEVELOPMENT AGENCY

OF THE CITY AND COUNTY OF SAN FRANCISCO

CITY HALL, ROOM 416

1 DR. CARLTON B. GOODLETT PLACE

SAN FRANCISCO, CALIFORNIA 94102

Tuesday, November 12, 2002

4:00 p.m.

Cathryn Bauer, Certified Shorthand

Reporter No. 12656

BARKLEY
Court Reporters

APPEARANCES:

Michelle, W. Sexton, President

David Habert, Moore Iacofano Goltsman, Inc.

Norman Rolfe

Jim Haas

Jan Johnston

Francis Mathews

Margaret Okuzumi

Ken Bukowski

Andrew Sullivan

Richard Mlynarik

Michael Kiesling

James Dear

Bruce Barnes

Andy Chow

Tom Dillon

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PRESIDENT SEXTON: I would like to clarify any confusion regarding the location of today's public hearing on the TransBay Draft EIS/EIR. When the Draft EIS/EIR was released on October 4th and the initial plans for the public hearing were being made, it was assumed that as is customary, there would be a joint public hearing between the Redevelopment Agency and the Planning Commission. However, as a new Planning Commission has just been confirmed by the Board of Supervisors, the Planning Commission will be scheduling a separate public hearing on the Transbay Draft EIS/EIR. The public will be notified of the Planning Commission's public hearing when the date is set.

For the public's information, the public comment period that was scheduled to end on November 25th will be extended to allow the public hearing by the newly seating Planning Commission and the public will be notified of the new closing date for public comment.

Notices have been placed on the bulletin board of the Legislative Chambers, and a staff person has been placed near the entrance to direct interested members of the public to this meeting room. I apologize for any inconvenience to the public. Thank you.

SECRETARY TANJUAQUIO: Madam President and commissioners, the next order of business is the hearing on the Transbay Terminal, Caltrain extension, Draft Environmental Impact

BARKLEY Court Reporters

Statement report. Madam Director.

MARCIA ROSEN: Thank you, Mr. Secretary. EIS CalTrans -- Caltrain extension. A senior planner, David Habert, will give a presentation on this item. And then as you know, the main purpose of this item is to hear public testimony.

DAVID HABERT: Good afternoon, President Sexton, Vice President Palamountain, members of the Commission, and Director Rosen. This is an assisted hearing device. Helps assist me in hearing you so I can hear you correctly. That's out of the way. Before we start the hearing on the Draft EIS/EIR, there are two points I would like to make. Again, just to echo President Sexton's statement that there was a confusion over the room, signs have been posted. There are people directing folks up to this room for the hearing. Second of all, this is the first of three public hearings on the Draft EIS/EIR. The second will be held tomorrow -- that's November 13th -- down in San Carlos, 1250 San Carlos Avenue, the headquarters of Caltrain and SamTrans, then a subsequent public hearing that the Planning Commission will hold. That has not been scheduled yet. Everyone will be notified when that is scheduled. I'd like to also point out, um, there are several people who have been instrumental in helping to get this together. Maria Ayerdi from the Terminal Joint Powers Authority. Joan Kubler from the Planning Department. Paul Maltzer from the

BARKLEY
Court Reporters

Planning Department. From the City Attorney's office, John Cooper. David Mansen.

MICHELLE SEXTON: Can you stand up so the commissioners will know --

DAVID HABERT: Yes, the scores of people whom -- will you stand up please -- who have helped put this together. It's been a very good effort in terms of the City family working together.

MICHELLE SEXTON: For the commissioners, can you identify the individuals.

DAVID HABERT: Yes, John Cooper.

BERTHA ONTIVEROS: From the City Attorney's Office.

MICHELLE SEXTON: Which office?

DAVID HABERT: I'm sorry. Paul Maltzer, Department of City Planning. Joan Kubler, Department of City Planning, Maria Ayerdi, CalTrans -- Caltrain. Sorry. David Mansen, who is the Transportation Group -- who is the consultant heading the team doing the EIS --

SHARON KYLE: Sharon Kyle.

DARSHAN SINGH: I didn't hear you.

SHARON KYLE: Sharon Kyle from Moore Iacofano and Goltsman.

DAVID HABERT: Okay. Again, um, the purpose of this meeting is solely to hear public comment on the adequacy and accuracy of the Draft Environmental Impact Statement/ Environmental Impact Report. The draft was issued on

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October 4th pursuant to -- we're within the 45-day review period of the Draft EIR/EIS. Again, the 45-day review period would have ended on November the 25th. However, as a new Planning Commission has just been installed, and will have their first meeting later this week, the public review period will be extended to accommodate the Planning Commission here. Once the Planning Commission releases the date for the public hearing, you and the public will be notified of the date. You may also keep abreast of the items with respect to the Draft EIS/EIR by contacting the Planning website which is http colon slash www dot sfc dot www dot sfgov dot org slash sfra slash planning. The Redevelopment which is the same as Planning is http colon slash www dot sfc dot www dot sfgov dot org slash tjpa.

Upon closing of the review period, staff will respond to all comments in writing. The draft with modifications and the responses to all of the comments will constitute the final Environmental Impact Statement/Report. Finalization and certification of the EIS/EIR is expected for the middle of 2003.

At this point, I would like to turn the floor back to the Commission to receive public testimony on the adequacy and accurateness of the Environmental Draft Impact Statement and so forth.

MICHELLE SEXTON: Yes.

SECRETARY TANJUAQUIO: I have speaker cards. The first speaker is Norman Rolfe, followed by Jim Haas. Mr. Rolfe?

NORMAN ROLFE: Good evening. I'm Norman Rolfe of San Francisco. We are in the process of preparing our comments and suggestions on possible changes in the rulings, and construction, and so forth and so on. I'll just hit some highlights of what I see coming down the line.

And, uh, generally, we support these projects, want to see them go ahead. But there are some modifications we're going to suggest. One thing we want to do is draw the attention of the agency to Proposition H in November 9 which says we shall not approve projects which might interfere with Caltrain, or the terminal, or so forth, including high-speed rail in the future. One of the things that should be done is that the attraction should actually go underground starting from the north end of Tunnel Number 1. Starting at 16th, the tracks would go underneath. This is going to be necessary in the future when this high-speed rail gets here, as we hope it will. That can be financed by not installing some of the ground storage tracks they have in the city. Those could be surface tracks. It's really critical that that be done.

And we also suggest the study authors engage in extensive ground evaluation engineering because of the sort of things that have been mentioned or will be mentioned,

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that they should be encouraged to examine and minimize effects on surrounding properties. That is, I believe -- we hope these drawings illustrate this, that they could reduce the taking of property by some little, slight changes, slight changes of right-of-way, and so forth and so on. And the terminal itself, might be possible to defer certain parts of it, certain aspects in the future, and get the thing going a little easier that way.

I believe that is, uh, all I will have to say at the moment. As I have said, we will hopefully produce quite an extensive little report for our suggestions so how some of these impacts can be mitigated a little better. Thank you.

SECRETARY TANJUAQUIO: Mr. Haas, followed by Jan Johnston.

JIM HAAS: Madam President, commissioners, I'm Jim Haas. I have been a member of many other committees, TransBay, CAC, and actually four prior committees to that. So I've been involved in this close to 15 years. I've seen an EIR be stopped and begin again, so it gives me great satisfaction to be here and see that it's almost at the completion stage. I went through it. It's a very dense document. And I'm sure that people having specific focuses on particular issues will have some comments on its accuracy and completion.

I want to make a comment on the larger question which relates to the money. And if you look on page 6 dash 8, in

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the chart there, there is a item that is numbered number 8 which is about $600 million. The source of the funding is very vague, and includes such things as Proposition 51 which is defeated by state voters last week, and some other very problematic things. That $600 million hole is going to be hard to fill.

Now, when this project, um, uh, came together in its present manifestation, San Francisco said in a fairly loud voice that we think this is so important that we're going to pay for a good deal of it. And therefore, I think we need to give thought, and this EIR needs to give thought to provide more local funds and cover that $600 million hole.

The first thing I think needs to be addressed in that EIR is the current configuration of the Redevelopment District with the holes in it that deal with developed properties. This means, that means that the increment for those six or seven holes are not going to be available for this project. There may be, um -- let me also say that I think that we also need to consider, and this should be discussed in the EIR -- is extending the district to the south to cover, particularly the two big parking lots on the south side of Folsom Street being contemplated for large numbers of housing units. That also could be a major source of tax increment for the area. And then, thirdly, I think -- this needs to be discussed in the EIR -- we're on the

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three-minute rule -- that the tunneling does not in any way make it impossible for major developments to go forward. And there is one on Mission Street which I think needs to be addressed specifically, for that matter, relating to the question of the demolition of buildings for the tunnel, particularly in the Historic District. Again, the choice of demolishing all these historic buildings for cut-and-cover as opposed to tunneling should be fairly obvious here. The EIR does not agree that you could build over those parcels where there is no choice but that there has to be demolition. And we should have in the EIR some idea of what can be built.

SECRETARY TANJUAQUIO: Jan Johnston, followed by Francis Mathews. Please state your name.

JAN JOHNSTON: Jan Johnston. I'm speaking on behalf of the management of 88 Perry Street in Yerba Buena Gardens which is a fairly new project with about 260 low-income apartments at 3rd and Perry. It's adjacent to the proposed bus storage where the diesel buses would be stored for the Golden Gate and AC Transit. And the concerns which were not addressed that we could see in the study is that, um, this building has operative windows, relies exclusively on the outside air for ventilation. And it is, you know, directly next to this proposed bus storage site. So we would like to have, um, studies done on the effects, the carcinogenic effects of

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diesel fumes. I know there are studies now on that.

Also, there's concerns about noise, and also traffic issues with the buses, especially on 3rd and 4th Streets. So pretty much, we're asking that you consider an alternative site closer to the Transbay Terminal. Thank you.

SECRETARY TANJUAQUIO: Francis Mathews. Followed by Margaret Okuzumi.

FRANCIS MATHEWS: I'm Francis Mathews. And um, we, I manage several properties along Stillman Street which like the previous speaker is adjacent to the new bus storage area that's proposed for the new Transbay Terminal. We weren't given a lot of advance notice, that we have letters that will be going out that will be more specific. But you know, our properties, you know, um, are both residential and commercial. They're lower-rise buildings with operative windows for ventilation. The EIR didn't address any of the added impacts of the, the diesel bus fumes, or the additional noise that would be associated with parking several hundred buses right next to, um, our properties.

This neighborhood is going to be severely impacted over the next 10 years during the seismic upgrade of the west approach to the Bay Bridge and followed, at the same time bringing the Third Street Rail Project down through the neighborhood and -- possibly the, you know, bringing a

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high-speed rail down Second Street. And we are in favor of the Transbay Terminal. We just feel that, um, um, um, we've been -- we are going to be severely impacted by all these other projects, and to, you know, wait all that out just to push the, um, bus storage facility down on our backs is unreasonable. We'd like to see, um, other alternatives investigated, including, um, in some of the redevelopment projects, restoring the buses down the lower level with those, widening the existing ramps where AC Transit buses are currently stored, or looking into other areas in mission Bay for the buses. So that, that sums it up. Thank you for your attention.

SECRETARY TANJUAQUIO: Ms. Okuzumi, followed by Ken Bukowski, and then Andrew Sullivan.

MARGARET OKUZUMI: Margaret Okuzumi speaking on behalf of Bayview Alliance, a grassroots riders groups with members throughout the Bay Area, particularly concentrated along the Caltrain line from San Francisco to Gilroy. Our organization strongly supports the Transbay Terminal project, including the CalTrain Downtown Extension, and we're very pleased those projects are moving forward and making progress. We're still reviewing the EIR, and hope to ask some of our questions tomorrow during open house.

Just some initial comments for the record, one is that we ask that the, the area encompassed by the EIR be extended

to include 16th Street and a possible upgrade separation there. We think this is important for the future operations and efficiency of the train service through that area and also a degree of separation.

We also think of the some of the impacts of the building might possibly be adjusted to reduce impacts, and to realize a cost savings to be used to grade separate those areas which have a great potential for conflicts with Muni service and proposed future Muni service, especially along 16th Street.

Um, just a note that the, the projected bicycle parking figure at a Transbay Terminal seems pretty low. It's listed as 105. I'm sure that the San Francisco Bicycle Coalition might have some more input on this. I know the Palo Alto bike station is currently parking 60 bikes a day. And ridership at that station is lower than projected at the Transbay Terminal, especially 20 years from now.

So I think that Norman Rolfe, who spoke first, made a lot of comments that we agree with. So we would ask you to consider, I won't repeat all his comments. And we'll be submitting comments before the end of the period.

SECRETARY TANJUAQUIO: Mr. Bukowski.

KEN BUKOWSKI: I'm a councilmember from the City of Emeryville; followed this project the last 10 years or so. I want to make a couple of points about the proposal

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currently out there to take out the bus ramps. It's really in the East Bay, sued CalTrans on account of taking down the ramp. A settlement was entered into where they were going to take the ramp down and proposed to put it back. It doesn't make sense to put it back without it being part of the new project. Somebody should look into that. We want to make sure that the terminal has viability.

Another concern is that when B.A.R.T. to San Francisco Airport is completed, that CalTrans will lose ridership. We have to be careful here. We want to keep the viability of this terminal so we don't lose it. Also I would hope that you would look at alternatives to building the expensive project before you. Maybe a lesser project was make it happen as opposed to this.

I'm going to submit detailed comments.

SECRETARY TANJUAQUIO: Mr. Sullivan, followed by Richard Mlynarik.

ANDREW SULLIVAN: I'm With Rescue Muni, the San Francisco Train Riders Association. We have been in favor of this project for many years, and so we are speaking on behalf of the project largely as written in the EIR, though of course we would like to urge the project team to pursue opportunities for cost reduction where it doesn't lead to reduction in service quality. We think it is a very, very important project for the region at large. Not only does it

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serve the commuter population and make the Caltrain service more useful, but it also serves the high-speed rail service that has to terminate in Los Angeles to be useful. California high-speed rail running from the Transbay Terminal, the Grand Central Terminal for San Francisco would be much more useful if it terminated in L.A.

We are pleased the terminal design has been put in place to lead to that ultimate project. A lot of years went into planning Grand Central Terminal a century ago in New York City. We're still benefiting from it today. It makes sense to repeat that experience here. A few specifics here that we'd like to make recommendations on. We know there's a choice among underground alignments for the service. We favor the Mission service that leads to a potential transbay tube. If rail will go across the Bay -- it could happen at some point, and we think it should -- we think through a new tube is the way to go that connects high-speed rail here to high-speed rail in the East Bay via high-capacity infrastructure. That makes sense because of, we don't think it's necessary to keep that terminal loop nor the buses, as long as the buses can maintain the same level of service which appears to be the case in the design as we've looked at it here. You can take that bus loop down, and use the land to fund the project, and reduce the cost to taxpayers which in this time of economic uncertainty is particularly

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appropriate. Plan for rail across the Bay in a not-too-distant future when high-speed rail is being extended beyond the initial network.

Couple of initial suggestions. We favor an underground connection to Muni Embarcadero station. It's important, much like in Europe where we have connection to SBahn and UBahn to the underground connection. It needs to be considered as part of the ultimate plan so users can stay out of the weather. This doesn't refer to the proposed Folsom alignment. We don't think that's necessary. A Pine Street alignment would make no sense. These are largely details. A very good job. We'd love to see this terminal get built for San Francisco with all deliberate speed.

SECRETARY TANJUAQUIO: Mr. Mlynarik.

RICHARD MLYNARIK: Our organization has been involved in regional transit issues, including marginally on the Transbay Terminal, for over a decade now. We're extremely pleased at the direction that process has taken. Something that needs to be borne in mind when you have people up here having a lovefest about how promising the Environmental Draft Report is, this is largely the outcome of an over-two-year Metropolitan Transportation Commission happened with the cooperation of Caltrain, CalTrans and from City Redevelopment. I think that's part of the reason that we're heading in the right direction. This isn't just one

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document, but an outcome of a great deal of study by a great number of individuals.

I'd like to include in my comments many things said already. Mr. Rolfe who spoke first said things about the -- separating the Caltrain alignment at 16th Street so we don't have to come in and dig in freshly-dug tunnels once separation becomes necessary. For specific issues, alternatives in the Environmental Impact Report as written, I believe the Mission Street alignment is superior because it has more capability of accommodating high-speed rail service in the future.

I think it's imperative the full development program be carried out. This is a premiere site to have transit-oriented development anywhere this side of New York City. It would be an abdication of San Francisco's responsibilities in the region and nationally to put up three- or four-story buildings. I think it's important to note this really is an integrated project. Transbay Terminal for bus service, Caltrain extension is what links them together. It's redevelopment which helps it work and helps the redevelopment work. So I think that's quite clear. This is documented. I encourage you to think of it this way.

I will also be making more detailed comment in the future of a more technical nature. I think it's important

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to note we have potentially an excellent project here. I look forward to you, and the city, and original agencies working to see it come to fruition.

MICHELLE SEXTON: Just for the people who have entered the hearing room, if you'd like to speak on this item, number 4(d) on the agenda, you can fill out a public speaking card and hand it to the secretary. If you could please speak into a microphone.

MICHAEL KIESLING: Good evening. Michael Kiesling of San Francisco. I've been involved in this project for quite some time also. Over the last decade, it's been refreshing in the last couple of years to see San Francisco take a role in this and conduct a professional study that's coming up with real answers and solutions into finding out how the project can be built and finished. In the past, if you followed this study, there were a lot of strange little studies that went along with this that had diesel trains running down Brannan Street or down Market Street. It's good to see the Commission and the city working to get the synergy of redevelopment in the transbay area, and bring transportation from the East Bay and Peninsula together in one place.

I will also be making comments. I agree with many of the previous speakers. We have an ability to clean up almost every property that has been languishing down there

for a long time. The Transbay Terminal has anguished over what has been going to happen to it for about 30 years now. Also, it's important to remember like the previous speaker said that this is probably the premiere opportunity in this country for the fusion of land use and transportation. And we're lucky that we're able to take some of the profits coming from development, the opportunity to develop the land there to work on the terminal to show when it comes time to get the funding in line that, um, San Francisco is making a large contribution to this project locally. That's about it. Thank you. Have a good evening.

SECRETARY TANJUAQUIO: Last card I have is from James, I believe it's Dean.

JAMES DEAR: My name is James Dear. I speak on behalf of homeowners at 21 Stone Street. We're concerned about the fumes from the storage unit. I mean the bus storage unit at the proposed site between Second Street and Fourth Street, concerned about the traffic impact on Second Street if buses are going to be grade separated, going to go on a rim across or above Second Street, then again between the storage, Third and Fourth Street, if we're going to cross that grade or be above Third Street. It's a very heavy-use street, Third Street.

Also concerned about the transit impacts for the residents in the nearby area. Document says 125 will be

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canceled, the 45, the 30, the 10, and all we get is a central subway. As far as I read, we're going to have a stop on Third and King, and, and then again at Moscone Center. Three blocks either way. I count four bus lines. It doesn't seem that San Francisco is friendly for the people living in the immediate area. We have an opportunity for open space, for parks. We live in a lot of concrete there. I don't see a lot of green space proposed, especially for dogs and such like that.

SECRETARY TANJUAQUIO: The next card I have is from Bruce Barnes. Mr. Barnes.

BRUCE BARNES: Good evening. I'm from 169 Stillman Street between 3rd and 4th Streets. My primary concern this evening is the proposed bus storage transit facility that's being proposed between 3rd and 4th in the area of Stillman. We've gone on the record with a letter quite some time back regarding some of the issues we'd like to see addressed specifically with regards of the bus storage facility and its impact on the neighborhood. I think that -- in reviewing the EIR report, I only saw a brief paragraph that considered the impact on the neighborhood. I'd like to see more time on some impact we perceive on diesel fumes, health effect on the neighborhoods. We have a lot of businesses, now housing going in that area. Our building is -- right now, we're in negotiating for a charter school, 15-20 feet

away from where the bus storage facility is being proposed. I'd like you to reconsider the location. There are a lot of areas that would better serve that type of facility, especially with not having a lid over the top of it like the current freeway is. Thank you.

SECRETARY TANJUAQUIO: Andy Chow.

ANDY CHOW: Hi. I'm Andy Chow. IÆm director of BayRail Alliance. Basically, I personally support this, this this proposal to, for new Transbay Terminal, and a new station for Caltrain, and a new extension. This project is really unique in a way that instead of relying on City -- instead of subsidizing the cities of redevelopment which unfortunately some other projects in this Bay Area are kind of like. The land use supports the project. Whatever development process came from the government, can use to expand transportation. This is what it is. This is reality in other countries, where they have intensive land use. Integration of transportation needs to happen in San Francisco. It is about time.

Regarding the EIR, it seems to me that the ridership for Caltrain could be higher. I think that the ridership has been somewhat conservative, and a little bit too strict in terms of their, uh, assumptions of the Caltrain service levels. I think that if they can play around with what kind of service levels that there is and possibly include

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high-speed rail, and maybe -- perhaps, there will be much greater ridership, more than enough to justify the project. Now, the project projection does justify it. But I believe there will be more. Thank you.

SECRETARY TANJUAQUIO: That's all the cards I have, Madam President.

MICHELLE SEXTON: Is there anyone in the public who wishes to address, could you come up, please.

TOM DILLON: Hi. My name is Tom Dillon. I just think that the rebuilding of Transbay Terminal or a transit terminal will be absolutely wonderful. I think that CalTrain needs to be -- speedier trains. The whole system needs to be much speedier. We live a rapid-moving world. Going around down to San Jose in a one-hour trip is just too long. I'm looking forward tremendously to the high-speed connection between Los Angeles and San Francisco, and I hope they utilize the absolutely best technology which we have. I'm a resident in the United States, employed by NASA. Thanks a lot.

MICHELLE SEXTON: Thank you. Public comment on this matter's closed. Any more comment? Not seeing any more comment. Public comment on this matter's closed. Thank you.

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Dated: Nov. 25, 2002

Cathryn Bauer

Cathryn Bauer
C.S.R. 12676

TRANSBAY TERMINAL/CALTRAIN DOWNTOWN EXTENSION/

REDEVELOPMENT PROJECT

DRAFT ENVIRONMENTAL IMPACT STATEMENT/

DRAFT ENVIRONMENTAL IMPACT REPORT

PUBLIC HEARING

11/13/02

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San Mateo County Transit District
1250 San Carlos Avenue, Second Floor
San Carlos, California

REPORTER'S TRANSCRIPT

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SAN CARLOS, CALIFORNIA, WEDNESDAY, NOVEMBER 13, 2002

7:07 P.M.

---oOo---

MS. PANG: Good evening, and welcome to the second public hearing for the Transbay Terminal/Caltrain Downtown Extension and Redevelopment Project.

I hope you had a chance to stop by across the hall there at the open house and chat with the team members about the various components of the project and their impact on the environment.

My name is Marie Pang. I'm staff to the Caltrain JPB, and I'll be facilitating the hearing tonight.

For the record, this is the official public hearing on the Draft Environmental Impact Statement/Environmental Impact Report for this project. Throughout this evening, we'll be referring to this document as the Draft EIS/EIR.

The Draft EIS/EIR was released for public review on October 4th, and the public comment period is scheduled to end on November 25th.

This hearing is being conducted on behalf of the project co-lead agencies: the City and County of San Francisco, the San Francisco Redevelopment Agency, the Caltrain Joint Powers Board, and the federal lead

agency, the Federal Transit Administration. This hearing is being recorded by a court reporter.

After a brief presentation by staff, we want to devote the rest of the evening to hear from you. Please be sure to fill out one of those speaker forms. If you haven't done so, please raise your hand, and Sharon will give you one.

The purpose of this -- Sharon?

The purpose of this hearing is to receive your comments. No responses will be given tonight. However, they will be addressed in the Final EIS/EIR and will become part of the administrative record for the project.

You can also submit your comments in writing to Paul Maltzer, environmental review officer for the City and County of San Francisco. His address is in the newsletter that's on the table back there. Written comments will also be responded to in the Final EIS/EIR.

At this time, I would like to turn the meeting over to Maria Ayerdi, executive director of the Transbay Joint Powers Authority. And many of you also know her as a director on the Caltrain Joint Powers Board, and she's also the project director for this project.

Maria.

MS. AYERDI: Thank you, Marie.

Good evening, everybody. Thank you very much for coming here tonight. It's a pleasure to have you. We're very excited about this project.

As you know, it includes the building of a new Grand Central Station in downtown San Francisco. We have partnered up with San Mateo County and Santa Clara County here, the Joint Powers Board, to help build a new facility and extend Caltrain into it.

It's an exciting project, because not only will it be a transit hub for buses and rail, but it also will be designed to accommodate future high-speed rail operation.

As you know, the senate -- or the legislature and the governor passed Senate Bill 1856. It goes to the voters in 2004; and if it passes, the first segment that will be built will be from Los Angeles Union Station into the San Francisco Transbay Terminal.

Eventually there's a possibility for the trains to continue on to the East Bay via an underwater tube under the bay and connect to the capitol corridor. So some day you'll be able to take the train from Los Angeles into the terminal for a two-and-a-half-hour ride and connect on to Sacramento and the rest of the country. So we're very excited about it.

The project also includes the development of

the surrounding land, approximately 4,700 new residential units, retail, indus- -- commercial and entertainment opportunities also abound.

So what I'd like to do is introduce Joan Kugler who's here with us tonight. She's our senior environmental officer from the Department of City Planning on this project; Darrell Maxey, Caltrain; he's the chief engineer.

We also have Sharon Kyle with us in the back here today. She's our MIG public outreach consultant. I see Paul Maltzer in the back there from the Department of City Planning for the City and County of San Francisco. You will address your comments to him. We have Dave Mansen, our consultant in charge of the environmental document from Parsons Transportation Group. I also see Gui Shearin in the back there.

And if I miss anyone, I -- I'm sorry. But thank you all for being here, and we look forward to hearing your comments. And I will now turn it over to Joan Kugler.

MS. KUGLER: Okay. We have a short presentation that gives you a broad generalized overview of the project, and so that's what I would like to do.

As Maria and Marie said, that the EIS/EIR is being circulated. It went out October 4th. And the

close of the public review period will be -- is now scheduled for November 25th.

This EIR -- EIS/EIR is just the latest of a lot of study that has gone into the terminal and for looking at SamTrans, Caltrans, AC Transit. All these agencies have had input into our work.

The Transbay Terminal is one block south of Market Street in downtown San Francisco. As you would come in over the bridge from the East Bay, you see downtown San Francisco, and the purple is where the new Transbay Terminal would be. It is at the site of the existing Transbay Terminal.

We've got three major project components for this in the environmental document. There's a Transbay Terminal replacement, the extension of Caltrain 1.3 miles from its existing terminus to the new Transbay Terminal, and a redevelopment plan to do transit-oriented development on the public lands around the terminal.

Our objectives are to provide a new terminal which would be a multi-modal facility to extend Caltrain and to establish the Redevelopment Plan.

First part is the Transbay Terminal itself. We have -- We are -- In the environmental document, we looked at two potential alternatives: the west ramp and

the loop ramp alternatives.

The proposed -- This particular slide shows what the west ramp alternative would look like. The new terminal would be in yellow where -- at the site of the existing terminal. Because it will be on the site of the existing terminal, we will need to put in a temporary terminal for buses and -- to use during the time that the new terminal is under construction. That's shown in yellow.

Caltrain would come up Seventh Street and then swing into the basement of the new terminal, and the bus -- new bus ramps from the freeway would link up the freeway and the new terminal.

There would be a need for additional bus storage, and we have allocated two sections underneath the freeway between Second and Fourth Streets. And that's those two areas there.

The MTC study that was completed in January of 2001 came up with a concept for a new terminal, and this shows one of their conceptual drawings for a multi-level terminal with a conceptual capital cost for the conceptual terminal being about a billion dollars.

In section view, we would have the train level in the lower basement. Then there would be a train mezzanine, which would be a cueing area and ticketing

area.

Additional ticketing would be at the ground level along with Muni transit, and there would also be some retail and other uses.

The concourse level would be a level where people would start to get up to the bus areas, additional ticketing, additional ability to have retail and/or cultural space.

The AC Transit level would be where most of the AC buses would come in, and passengers would board or exit. And then other buses and paratransit would be at the topmost level.

We have carried a optional pedestrian connection from the Transbay Terminal to BART and Muni Metro, and that is one block away on Market Street.

The other -- next project component is the Caltrain downtown extension. As -- We have two potential alternatives that we're looking at: Second-to-Main and Second-to-Mission.

Okay. If you look at this area, No. 5 is the existing Caltrain station. The underground alignment would go down Townsend S- -- go east on Townsend Street and then come -- turn into Second Street, go north until it swung into -- to the Transbay Terminal, which is No. 1 on this map.

In both alternatives, that segment is exactly the same. The differences come in where the tail track would be. Number 3 is the Second-to-Mission alternative, and No. 4 is the Second-to-Main.

There will also be some work that will need to be done in the Caltrain yard and in the existing Caltrain area. Go down Townsend Street, turn the corner, swing up Second Street. Go up Second Street until you reach the area where the new terminal will be. And then you see in the red is the Second-to-Mission, and the yellow is the Second-to-Main alternative.

Transbay Terminal is an extremely important transportation connection from the freeway from the East Bay to San Francisco. Autos can come off the freeway and be right there by the terminal. AC Transit and Greyhound. You see here the two-commuter rail.

Muni will continue to serve the area as well, we mentioned, the potential connection betw- -- to the BART and Muni and then, of course, Samtrans and Golden Gate Transit. So all those elements come together at that one hub.

The third project -- major project component is the Redevelopment Plan. We're also looking at two alternatives for this. One would be what we call the Full Build alternative, which has about 7.6 million

square feet, 4,000 -- approximately 4,700 dwelling units, and then the Reduced Scope alternative, which has approximately 4,700 square feet and would have 3,400 units, dwelling units.

We're looking at the development of the publicly owned land, which is shown in red. Both of the alternatives will be within that blue boundary, which would be the new Redevelopment Plan area.

MTC study looked at both the existing area around the Transbay Terminal and then what could be in the future with the new terminal. They had the 7.6 million square -- square feet is included in hotel, and -- plus -- which would be right by the terminal, plus other buildings that would be along Folsom and, I guess, Main.

Okay. Cost estimate. We worked out -- In Chapter 6, we have cost estimates for all the alternatives, but when -- we put this slide together as a indicator of what one of the alternatives could cost.

This is the west ramp terminal option with the Second-to-Main tunnel in a tunnel configuration and the Second-to-Main alternative for Caltrain. To re- -- The cost estimate is approximately one point three point -- 1 billion 3.1 million dollars to rebuild the terminal, and $786 million for the downtown extension.

Because we would be looking at loan, we would need debt service, which would add to the cost; and then we're hoping to do value engineering and perhaps come down with a reduction in cost. So the grand total would be 2 billion 668.6.

The funding plan shows where we have located the probable funds for the downtown extension: local sales tax; federal moneys: We talked about -- TIFIA, which is Transit Integration Facilities Act, and that's a loan program; other federal moneys; state; and then there's a number of local measures that could be used.

So looking at a pie chart, federal funds would be approximately 21 percent, state funds 15 percent, and local funds would actually be 64 percent because the bridge toll funds and other local funds would add up to that.

In the environmental process, we had scoping meetings in April 2001. There was a scoping meeting right here in this room. We reevaluated the alternatives according to the public comments that we had gotten. We did some engineering to further refine the project components; and then, of course, we went into the environmental evaluation phase and prepared the Draft EIS/EIR, which has been circulating for the last month.

Long-term environmental impacts would be displacements. Both terminal alternatives would displace two nonresidential uses, and the downtown extension alternatives range from 23 to 60 residential units, 40 to 58 businesses.

There would be noise and vibration impacts from bus storage east of Second Street. We're talking about mitigation with a sound wall. Vibration impacts were also found which would be mitigated with track fasteners or tie systems that would be resilient.

The redevelopment component would eliminate approximately 1,950 off-street parking spaces. However, we are adding a parking garage at Fourth and -- Street, and also the project is expected to encourage a great increase in transit use.

During the construction phase, which is a temporary phase, there will be some need to close block by block Seventh Street with detours.

The tunneling option would also require detour plans and parking removal for at least one block. And then for the temporary terminal, we would need to do contra-flow lanes and remove some parking and traffic lanes on Beale, Folsom, and Main Street.

Again, during the construction phase, parking would be removed on sections of Townsend, Second and

Third Street as would the tunneling option also would remove some parking, much more limited amount.

Construction noise and vibration could affect nearby residents and workers, and we have a set of mitigation measures which will reduce that impact.

We did come and find unavoidable adverse impacts. The No. 1 was demolition of buildings that are either eligible or on the National Register of Historic Places. Both options would require the demolition of the current terminal and loop ramp, which are contributing elements to the Bay Bridge.

If cut-and-cover is the selected construction methodology, that would require the demolition of 13 buildings that are eligible for the National Register. Tunneling reduces that by ten buildings but still would require the demolition of three eligible buildings.

We found traffic congestion which exceeded our thresholds of significance at these seven intersections [indicating].

Our environmental schedule is to -- we released the document on October 4th. Last night we had a hearing in front of the Redevelopment Commission. Tonight is the Joint Powers Board public hearing. The San Francisco Planning Department Planning Commission

will also have a hearing.

Due to a change in the way the Planning Commission members are appointed, we haven't had a Planning Commission since last June. So their first meeting is actually tomorrow; and at that point, they will set the rest of their calendar, and we will have a date to put instead of "TBD," which stands for to be determined.

The close of the comment comm- -- public comment period is scheduled for November 25th. If the Planning Commission schedules their hearing after the 25th, we would hold open the public comment period. But I would suggest to everyone who will be writing additional comments in -- in addition to what they say tonight to think about getting their comments in by November 25th.

Project milestones. In 2000 -- In April of 2001, the Transbay Joint Powers Authority was formed.

The Transbay Terminal project was listed in the Regional Transportation Plan in 2002. We've gotten the Draft EIS/EIR and circulating.

The next step after the close of the public comment period will be to select what we term a locally preferred alternative for purposes of doing the Final EIS. And that in the federal process, we need to come

up with one alternative in each of the three components so that we can prepare a Final EIS. In late spring, early summer, we hope to have EIR certification and an EIS Record of Decision.

Groundbreaking for the temporary terminal will be scheduled in the latter portion of 2004.

And the Transbay Terminal would be completed 2008, 2009.

So thank you very much for your attention. We really wanted to hear from you tonight, and so I hope that you'll fill out a speaker card and give us your comments on the Draft EIS/EIR. Thank you.

MS. PANG: Okay. Is there anybody who hasn't filled out one yet who wishes to?

Thank you.

MR. LYSYY: [Unintelligible.] Why do you want to . . . so much?

MS. PANG: Excuse me. I'm sorry. Would you mind filling out a card so that, you know, we can pick it up and you can speak. Sharon will give you a card, and you can --

MR. LYSYY: [Unintelligible.]

MS. PANG: Yes, and you'll get a turn, okay? Thank you. When you finish filling that out, could you give it to Sharon and -- yeah. There are other people

who wish to speak, and they will take a turn.

MR. LYSYY: [Unintelligible] . . . come?

MS. PANG: Yes, please, yes.

Okay. Now --

MR. LYSYY: I'm sorry.

MS. PANG: Yes.

We now come to the most important part of the evening. As Joan said, we want to hear from you; and so everyone who filled in a card will get a chance to speak tonight.

I have Patrick Moore here.

When you come to the podium, please spell your name for the court reporter. Patrick? Are you here?

MR. MOORE: My name is Patrick Moore, P-a-t-r-i-c-k, last name M-o-o-r-e.

The question -- The concern I have is that talking to Darrell before the meeting, it looks like that the tunnel envelope going from the Fourth and King station to -- onto just short of the Transbay Terminal would be constricted to two to three tracks.

Considering that Caltrain is planning on spending a lot of money to four-track their entire system and considering also that this section of track will probably be a fairly slow section, it seems like there needs to be better planning for at least four

tracks and, you know, maybe trying to fit five in somehow, although I don't know how you can do it.

But constricting ourselves -- yourselves down to two tracks in a section where it would be very difficult to add other tracks seems to be a real bad idea, especially considering the probability of having to make deadhead moves along that same section of track.

MS. PANG: Thank you.

The next speaker is Adrian Brandt.

MR. BRANDT: Adrian Brandt is spelled A-d-r-i-a-n, B-r-a-n-d-t.

I just want to speak in support of the whole project and the plan. But what I am concerned about is that you really only have one chance to do it right the first time, and I'm sort of taking a slightly different tack than the prior speaker is that I'm worried about having enough tracks in the facility itself to accommodate sort of the future demand that I would expect to see with Caltrain and high-speed rail in the same facility.

And I -- There's a -- I've seen drawings that are more creative than those in the two official alternatives that seem to shoehorn a lot more tracks and platforms by using a little bit more creative alignments, and I would really like to have this body do

all that it can to explore what it would take to do something along those lines.

I mean, maybe not that exact thing, but in the spirit of that, I -- I'd like to see, you know, more than two long platforms for high-speed rail, you know, like this other drawing I'm referring that I've seen on the -- on the World Wide Web has four tracks. The platforms aren't, you know, straight and narrow, but they -- they -- it's a much -- it seems like a much more creative plan.

And I'd like to see a little bit more creativity in trying to get this thing as -- as -- get the capacity up to the maximum possible from the start, because once it's built, there's really extreme pain involved in ever trying to do that, so -- in the future.

So I just want to see that explored a lot more aggressively. That's the key comment. Thanks.

MS. PANG: Thank you.

Next we have Eugene Bradley.

MR. BRADLEY: Yes. My name is Eugene Bradley. First name is spelled E-u-g-e-n-e. Last name is spelled B-r-a-d-l-e-y.

Speaking as somebody who has used major terminals before in New York City with Grand Central Station, with Penn Station; looking at this project, my

concern is -- is that you do not have enough train tracks to accommodate not only any future high-speed rail, but also Caltrains' current expansion plans. You're going to need, from what I can see, at least eight tracks or more in order to accommodate Caltrains as well as high-speed rail.

My other concern is: I'm still a little bit caught up between the cut-and-cover and the tunneling. Traditionally tunneling can be very expensive and very dangerous, particularly you're going underneath, as I understand, land, former salt, former mud that the area is now in.

My concern is -- is that I haven't seen any real cost controls. As much as I like this project, my own concern is: I don't want to see the cost of this project double like it has with the Bay Bridge.

But for the most part, I am for this project with the concerns that I had stated. Thank you.

MS. PANG: Thank you.

Margaret Okuzumi.

MS. OKUZUMI: Good evening. Margaret Okuzumi, M-a-r-g-a-r-e-t, O-k-u-z-u-m, as in Mary, -i. And I'm speaking on behalf of Bayrail Alliance.

We strongly support the Transbay Terminal project. And as some of you may know, we raised a

massive lobbying campaign to get the governor to transfer the land -- for the state to transfer the land to make this project possible.

And my board -- it is -- has still -- we're still compiling our comments on this whole project. So we will be submitting written comments before the close of the comment period.

But there are a couple of concerns I do want to lift up. Again, we strongly support this project. One is that we ask that the scope of the EIR be extended southward to encompass 16th Street and the grade separation there. Muni has frequent service along that street, and we foresee a lot of conflicts if a grade separation is not included there.

Also in the -- this Draft EIR, the -- it talks about how the CPUC has approved a grade crossing at Common Street. I wonder if that would include approval for four tracks across Common Street, because based on what I've seen of their -- what they've been willing to approve in Santa Clara County, it just -- I'm presuming that that approval was based on -- on two tracks, not four.

So I'm concerned that that would need to be grade separated also. So I'd like for some more information on that.

Also, the amount of bicycle storage at the terminal seems a bit low. I mentioned last night that the Palo Alto Bike Station is currently parking 60 bicycles a day, and their patronage is not as high as -- as Fourth and King right now, especially projecting out 20 years into the future, and it seems low.

Overall, I think as far as the alternatives are concerned, the west ramp alternative looks like it has -- you know, it's a superior ramp alternative because it allows for more redevelopment. Just aesthetically also it's better. And so I think we would support that.

There are some concerns about whether the Second-to-Main alternative does a good job of accommodating high-speed rail. So we'll have better questions about that.

And then as far -- let's see. Oh. And then we support the full build, you know, that provides the most return to the project. It makes the most sense. We have this incredible nexus of public transit and land use, and we need to keep that very strong for this project.

So I think -- well, I think that's -- you know, so there's some comments to chew on for now, and we'll

be submitting more. Thank you.

MS. PANG: Thank you, Margaret.

Jeff Carter?

MR. CARTER: Thank you and good evening. My name is Jeff Carter; that's J-e-f-f, C-a-r-t-e-r. I too support this project and the Caltrain downtown extension. It's been studied to death, and we need to get it done as quickly and as efficiently as possible.

I haven't had a lot of time to read the report because October has been extremely busy for me with World Series and Halloween. So I'd like to, you know, take a little time to read more into the -- the document.

But as previous speakers have said, the project needs to provide enough capacity to support high-speed rail, projected increase in Caltrain service, inner city Amtrak service and all -- you know, whatever else, you know, we can -- we have.

Also, I would support the idea of the Mission Street alignment so that there is the possibility of a future transbay tube in -- parallel to the existing BART transbay tube so we can turn San Francisco into a true world-class transit system with a, i.e., Grand Central Station in San Francisco.

Other concerns I would have is to decrease the

radius as much as possible of the curves so that the trains could, you know, go as quickly as possible through the project. You know, you look at the maps, and there are some very sharp curves which do restrict the speeds of the trains; and, you know, getting the speeds up there as much as possible is going to attract more people to the -- to the train.

So that concludes my comments. Thank you very much.

MS. PANG: Thank you.

Onnolee Trapp?

MS. TRAPP: Onnolee Trapp, O-n-n-o-l-e-e, T-r-a-p-p. I'm with the Legal Women Voters, and we will be submitting written comments before the deadline from the whole Bay Area league.

And we have some concerns about the financial projections, especially if the full build is not done.

We also have some questions about the platform configurations for the train. It's not entirely clear how many train cars could unload at one time and at what speed, what space between trains, that sort of thing, from the drawings in the book. The previous several years ago go-around had a little more explicit information, so I was looking for that this time and not finding it.

We are very happy to see that part of the project does include housing, especially affordable housing, but we will make more comments later.

MS. PANG: Peter Sheerin, Sheerin. Sorry. Probably mispronounced.

MR. SHEERIN: No. That was -- That's correct. The last name is spelled S-h-e-e-r-i-n. And I've got basically four or five comments.

I'd like to reiterate the concern that several other speakers have made about the number of tracks. I feel that four -- at least four tracks is critical to supporting the local trains, express trains and long-distance. And, you know, if you've got all three of those, maybe you need five or six to support that and deadheading. But at least four seem to meet the minimum that you need to be able to load both local and express trains in both incoming and outgoing directions.

And I think the whole project should be built as close as possible to Market Street because that's where you've got the greatest number of people commuting through, and the transit corridor is all right there with the surface rail and the Muni and the BART.

And if you live further away, even with an underground terminal, the further away you make it from Market Street, the longer that transit time is and the

longer people's overall commute is. And you really need to make sure that connections are short, simple, easy, and direct as possible.

I'm also concerned that there don't seem to be any plans with the Ferry Building or the Ferry terminals; and it seems to me that by -- I don't know if it's possible, but by shifting it a block east, it might be possible to make another underground connection to the Ferry terminals or overhead pedestrian passways to make it possible to have more direct connections possibly even with a small people mover.

But I think that's very important that you get people an easy way to get from the Ferry Terminal to the integrated terminal.

And I'm also concerned that some of the sketches I've seen here of multiple levels on the platform separates the ground level from the train and bus terminals by two or more levels, and that seems to me like that will also make it more difficult and cumbersome for people to make connections. You have to deal with elevators and escalators and staircases.

And in that case, it seems to me if you could -- maybe it's not possible to do on one level, but eliminate the intermediate mezzanine level if at all possible so that the -- again, the travel time is

decreased.

And that's basically it. Thank you for your time.

MS. PANG: All right. Thank you.

Is there anybody else who wish to speak?

Sir?

MR. ATTENDEE: Want to speak?

MS. PANG: Would you like to speak?

MR. LYSYY: Yes, yes, yes. I finish.

MS. PANG: Oh, you may speak if you like.

MR. LYSYY: Yeah.

MS. PANG: Yeah. And you can also submit it in writing.

MR. LYSYY: Yeah, sure. I still don't understand: Why do you want to --?

MS. PANG: Please come to the podium, yes, please, so that we can all hear you.

MR. LYSYY: I'm sorry. I still don't understand: Why do you want to -- to put -- to put the train -- to put the train to buses?

MS. PANG: Yes. Excuse me. Can you just stop for a minute? Could you say your name to --

MR. LYSYY: My name.

MS. PANG: -- the court reporter?

MR. LYSYY: My name, yeah.

MS. PANG: -- court reporter?

I'm sorry. I'm sorry. I forgot. My name is Yevgeniy Lysyy of Sunnyvale.

THE REPORTER: Please -- please spell your name, sir.

MR. LYSYY: Sure. Y-e-v-g, like a George, -e-n-i-y.

THE REPORTER: Thank you.

MS. PANG: Thank you.

MR. LYSYY: I'm sorry. I'm sorry.

MS. PANG: Thank you.

MR. LYSYY: Question is: Why do you want to put -- exactly to put a train to buses instead of for -- why can't just buses go to the train station, the train station? What's the reason for this project?

MS. PANG: Wait. I'm sorry. We're not going to respond to comments tonight, but we will respond to your comment in the Final EIS, okay? Thank you.

MR. LYSYY: Because I don't understand what's the reason for this project. Problems now some are prejudiced over existing?

MS. PANG: Yes.

MR. LYSYY: Sure. Yes, I believe, yes. But there's -- there are much more important problems in the United States and by people in the Bay Area, in

particular, the transportation field.

Caltrain, I admire Cal- -- admire Caltrain. It's -- it's very -- very smart way and like for stupid European multiple units.

But one train in half an hour, it does not very good service. Trains would be -- Trains could be short just for two cars but around every 10 to 15 minutes. Free to commute cut costs. Must be twice as big, yes.

MS. PANG: Yes. Okay. Thank you, yes.

MR. LYSYY: There -- there must be a rapid transit across the bay. There is a bus, but it's also goes rarely, once a half an hour, and it's slow. It goes on city streets. It's convenient for people of Palo Alto and Union City but not for people of Sunnyvale on Amtrak, not the rapid transit. The Dumbarton train could be such transit. But why do you wait for a long time?

MS. PANG: Thank you very much for your comments.

MR. LYSYY: Then Altamont train is a -- Capitol trains are also -- they are one train in the -- more than one hour. It's stupid. It's commuter trains, it's called.

Then there is another one from San Mateo to Cupertino. It's 18 miles across the way. It could be

a -- like BART in this area, but now there's no passenger service at all.

So there are -- I mean, I'm from Russia, and the Russian off -- often call Americans "practical impractical Americans." And so what do we see? So-called practical Americans? I about to spend huge money. There is -- there is a reason. There is a reason for this project.

MS. PANG: Yes.

MR. LYSYY: Yes. But there are much more important -- important project. And I could show you picture, for instance.

MS. PANG: Well, thank you very much, sir. I do have your written comments.

MR. LYSYY: This picture [indicating] shows train -- train coming off. Train -- train comes every few minutes. Most -- most pleasant -- most pleasant subway here.

But some use ground transportation. You see many cars, buses, street cars there; and so trust me, all -- three or four trains must go train station to over here. And trust me, all the stuff, it's all been problems. This all structures. Facility over bus, about from here [indicating] 1,000 --

MS. PANG: Sir, I must ask that you -- excuse

me.

MR. LYSYY: -- from here to here.

MS. PANG: I must ask --

MR. LYSYY: And it's also --

MS. PANG: -- that you -- can you please confine your comment to just this project for this evening? That's the reason why we're here, and --

MR. LYSYY: I'm sorry.

MS. PANG: -- I -- yeah. I've heard your comments, and we thank you very much.

MR. LYSYY: I'm sorry. I have no comments to this project.

MS. PANG: Oh, all right. Thank you very much.

Is there anybody else who wish to speak?

MR. SHEERIN: Yeah. Can I add some additional comments?

MS. PANG: Sure. And please restate --

MR. SHEERIN: This is --

MS. PANG: -- your name.

MR. SHEERIN: -- Peter Sheerin again, last name S-h-e-e-r-i-n. And I just have a few additional comments.

In looking at the diagrams and listening to the last speaker, it occurred to me I don't see any large seating areas in this cross section of the terminal, and

that's been one of the -- I think, the biggest problems with the existing Caltrain terminal and much of the stations along the way.

It's -- There are a few benches, but not very many. And so if you've got a trainload of people waiting for the next train, they all have to stand; and that's not very inducive to con- -- convincing more people to mass transit and a train three quarters of your way to commute.

It's, you know -- especially like the end of the day: Tired people want to sit down, and you ought to need to let them do that on a train or in large seating areas, such as are found in other train terminals throughout Europe and the US.

And partially I'd like to address the last speaker's comments on why he doesn't think this project is necessary.

But to encourage people to take mass transit in greater numbers and more frequently, you need to make the connections as few as possible and as easy as possible; and the current location of the train station is not conductive to that, and not all of these designs are conductive to that.

You need to make the station layout have as few levels as possible, be as easy to get through, lots of

seating, easy connections to both trains, buses, the mass transit on Market Street, and the Ferry Terminal.

MS. PANG: Okay. Thank you.

MR. SHEERIN: Thank you.

MS. PANG: Anybody else?

Okay. Since we have no more speakers, this will conclude the public comment part of this hearing.

And now I just want to recap what Joan said about the next steps.

After the -- Following the close of the comment period and after considering all the public comments received and the information in the Draft EIS/EIR, the local lead agencies will select the locally preferred alternative from amongst the alternatives and design variations presented in the Draft EIS/EIR. The locally preferred alternative will then be evaluated in the Final EIS.

Upon completion of that EIS, each local agency, as Joan said, will cer- -- will certify the Final EIS to adopt the project. And then the Federal Transit Administration will approve the Final EIS/EIR and issue what we call a Record of Decision. And this will complete the environmental review process for the project. Okay.

This concludes the public hearing. Thank you

very much for taking your valuable time to come here tonight and to share your views about the project. Good night.

(Off record at 7:52 p.m., 11/13/02.)

---oOo---

CERTIFICATE OF REPORTER

I, CHRISTINE M. NICCOLI, Certified Shorthand Reporter of the State of California, do hereby certify that the foregoing meeting was reported by me stenographically to the best of my ability at the time and place aforementioned.

IN WITNESS WHEREOF I have hereunto set my hand this 27th day of November, 2002.

Christine M. Niccoli

CHRISTINE M. NICCOLI, C.S.R. NO. 4569

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MEETING

November 26, 2002

Cathryn Bauer
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Tuesday, November 26, 2002

12:30 p.m.

Cathryn Bauer, Certified Shorthand

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MICHAEL ANTONINI: If I could have everyone to have a seat, please, we'll get started on our next item momentarily.

We're officially back in session again. I ask Mr. Ionin to call the next item.

SECRETARY IONIN: The item is Case Number 2000.048E, Transbay Terminal Caltrain Downtown Extension Redevelopment Project, public hearing of the Draft Environmental Impact Statement, Draft Environmental Impact Report.

MICHAEL ANTONINI: Thank you. I see Mr. Cooper at the microphone. He wants to begin with a staff presentation on this item.

RICK COOPER: Good afternoon, commissioners; I am Rick Cooper, staff from the Environmental Analysis Section of the Planning Department.

The item before you is Case No. 2000.048E, a Draft Environmental Impact Statement/Environmental Impact Report on the Transbay Terminal/Caltrain Downtown Extension/Redevelopment Plan. This is a joint environmental document and was prepared to satisfy the requirements of both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA).

Today's action is a public hearing on the adequacy and accuracy of the information in the Draft EIS/EIR for the project. There will be no decision today to approve or disapprove the project. We are here today to receive comments

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from the public and yourselves regarding the Draft EIS/EIR as a part of the environmental process as required by both the federal and state environmental laws.

The three major components of the project are the construction of a new multimodal Terminal at First and Mission Streets; an underground extension of Caltrain to a new terminus in the basement of the proposed new Terminal; and establishment of a Redevelopment Area Plan with related transit-oriented development projects. Other subordinate components of the project include a temporary bus terminal facility at Main, Beale and Folsom Streets to be used during construction of the new Transbay Terminal; a new, permanent, off-site bus storage/layover facility; reconstructed bus ramps leading to the new Transbay Terminal; and a redesigned Caltrain storage yard.

The draft document was advertised and released for public review and comment beginning October 4, 2002. Two public hearings have already been held -- the first on November 12, 2002 in front of the San Francisco Redevelopment Agency, and the second in San Carlos on November 13 for Caltrain -- the Peninsula Corridor Joint Powers Board. The period for written comments on this joint environmental document has been extended. The period during which staff will accept written comments will be extended from the previously noticed date of November 25th to Friday December 6th at close of business.

We have a court reporter here today who will be recording

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these proceedings. I ask you to speak slowly and clearly so that an accurate record can be made. Staff will take all the comments on the environmental documents and will be responding to all comments, both those received in writing, and those from the three public hearings, and get back to you with the comments and responses, hopefully by late spring or early summer. This environmental process will be completed before any decisions on the proposal for the new Transbay Terminal, the extension of Caltrain, and the creation of a Redevelopment Plan area will be made by the three co-lead agencies.

This concludes my presentation on this matter. And unless the commission members have any questions, I would respectfully suggest that the public hearing on this Supplement to the Draft EIR be opened.

Again, I would like to emphasize as did Director Green that we are taking comments on the adequacy and accuracy of the environmental document, and not on the rest of the project. Thank you.

MICHAEL ANTONINI: Commissioners, do you have any questions?

WILLIAM LEE: One question. If we meet the SEQA regulations, I assume we also meet the NEPA regulations since SEQA is more restricted than NEPA?

RICK COOPER: I believe that's correct, that generally, the SEQA requirements are greater.

WILLIAM LEE: Is there any federal property on the site?

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Because if there isn't, there's really no need to consider NEPA because we're already doing SEQA.

LAWRENCE B. BADINER: There's federal money involved. So we have to.

WILLIAM LEE: I don't know why we have to talk about NEPA. But there's federal money at stake, so it makes sense.

MICHAEL ANTONINI: Thank you, Mr. Cooper. Any other questions from commissioners? Okay. I think I'm going to officially open public comment. And we're going to limit comment to five minutes per speaker as we did with the earlier item. And as Mr. Green mentioned, our comments are on the adequacy of the Environmental Impact Report that is before us. So our first speaker is Luis Belmonte. Is that correct?

LUIS BELMONTE: Close enough. You're not the first person to mispronounce it. Luis Belmonte. I am one of the developers and one of the owners of the Yerba Buena Commons, 257-unit SRO project at the corner of Third and Perry Streets. And despite all of the rotten things said about SROs today, I think we have a fine place for people to live: 220 square feet of housing including a kitchen and bathroom, and for $600 a month, you get a furnished unit with utilities and cable television. It's safe, it's clean, and it's affordable. Our income threshold is approximately $22,000 a year, 40 per cent of the median.

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I have 257 residents who live immediately adjacent to the place that the EIR proposes to put all the buses, and I think that's an inappropriate place to put the buses. And I think that that impact should be looked into as part of this EIR. We get enough noise and pollution from the freeway. And from proposed freeway relocation, I think that this adds unnecessarily to the burden. And given, uh, uh, all of the cant that surrounds affordable housing, we actually have some here that was produced. And we shouldn't denigrate the lifestyle of the people who are living there by putting all the buses in the world right next to them. Thank you.

MICHAEL ANTONINI: Thank you. Next speaker is Monica DuClaud.

ELIZABETH CARNEY: My name is Elizabeth Carney. Monica had to go back to work. She asked me to speak for her. She wanted me to tell you she's quite concerned about putting the bus depot in the area of Stillman and Second Street where we all live in the Clock Tower which is 461 Second Street. And that she also wanted me to mention that the complexity of tunneling, the cut-and-cover plan really requires, uh, more of our study and analysis than we in the Clock Tower have had a chance to make.

There's 127 families that live in that building. And we've only recently, by accident, kind of, learned that this analysis process is going forward. As a result, we're

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hoping that, um, that comment period could be extended while we, uh, take the opportunity to look and see what are the impacts on our building.

And I wanted to tell you a small story. In the early 1900s, there was something called the Second Street Cut. The idea was that they were going to make the hill, at Rincon Hill, a little bit flatter, so it was much easier to bring wagons from Market and Mission down to the Bay. And the politicians got together and made a plan for doing that, and did so. They made a big cut in Second Street. Shortly after that happened, the houses that were on Rincon Hill fell off the hill. And that was the end of development for Rincon Hill for a very long time. So we're hoping that the planning process can have enough, um, um -- careful study and analysis at the beginning of the process that these kinds of futures will be something we don't repeat again. Thank you.

MICHAEL ANTONINI: Thank you. Our next speaker is Roger Brandon. He's going to be followed by Jan Johnston Matthews.

ROGER BRANDON: Members of the Commission, my name is Roger Brandon. I'm here about the proposal to move the downtown Caltrain terminal from its present location at Fourth and Townsend Streets to First and Mission Streets, going underground on Second Street, having two levels underground

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at First and Mission Streets. It is expensive to locate a railroad underground.

This project raises many other questions. How many trains will be waiting underground to unload at First and Mission Streets during the morning rush hour? It would be easier to find some other way to get into the downtown business district. If you're familiar with the, the train system, you know there could be 10 trains arriving in an hour, and several trains leaving in an hour. This proposal does not seem feasible. Many people do not realize that we already have a good connection with downtown transportation lines for incoming rail passengers. All they have to do is a cross to street to Fourth and Townsend Streets and board a Muni Metro line which will connect them with a transbay rail system.

We have a transbay connecting system in places. For good reason, San Francisco voters rejected the proposal on the San Francisco ballot one year ago. It is not necessary. It is impractical. This is another waste of money, spending money for the sake of spending money. The present terminal location at 4th and Townsend Streets is better for the city, and we should reject this underground terminal. We had better find some practical-minded fiscal managers for the city who do not want to put up a new building every time we find a surplus in the accounting. We find that the EIR

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overlooks many, many obvious problems and that the proposal, it is a, not realistic, not a good idea. And the voters, the voters decided against it a year ago on the ballot. Their good decision should not, should not be overturned. Thank you.

MICHAEL ANTONINI: Thank you. Our next speaker, Jan Johnston Matthews, please, followed by Ted Pollak.

JAN JOHNSTON MATTHEWS: Hi, my name is Jan Johnston Matthews. I wish to comment on the proposed terminal for bus storage. I don't feel that there was adequate environmental studies done on this site. In fact, although we spoke at the initial scoping meeting over a year ago about our concerns, Stillman and Perry Streets weren't addressed in the EIR.

This proposed site is a high-density area with hundreds of residents, low-income housing as well as office buildings. Many of these buildings use exterior air as their sole source of ventilation, mostly opening windows. So since Perry and Stillman Street is narrow, they're close to these lots. You've got the overpass close to this area, creating a lid effect which would exacerbate the noise and the toxic diesel emissions from the bus storage site, not only as they're entering and leaving, but as they sit there and idle to warm up. And I can go into more details in a letter.

This storage would also impact traffic and safety issues in our community. I request again that you analyze alternative sites for buses that -- bus lines that need to access the Transbay Terminal. Incorporate their storage areas in or around the Transbay Terminal more closely to the Transbay Terminal site vs. blocks and blocks away. For those buses that don't need access to the terminal, store them, either at their existing sites, or in an industrial area that doesn't have a high density, residential and commercial usage that this area has.

In the SOMA community planning process, rezoning alternatives that was distributed and discussed at the November 19th meeting, it shows that this area, Stillman and Perry between Second and Fourth, is one of the areas being encouraged to be more residential. Would you allow a company to build, or a person to come and build a facility that have the emissions, the noise, and the diesel, and everything else that this bus storage site would? You know, impact, how it would impact our neighborhood.

So please consider that in your report, that this is a community, not just an area underneath the approach to the Bay Bridge. We already have to deal with the teardown and building of this rail at our doorsteps, and possibly the Third Street Rail, and the Second Street tunnel or tube. If you put a bus storage site in front of your doorsteps. It's

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like the nail in the coffin. There goes our community. So please, I ask that you do more detailed study on this, and also analyze alternative sites for the bus storage. Thank you.

MICHAEL ANTONINI: Thank you. Our next speaker is Ted Pollak, followed by Elizabeth Carney who actually already spoke, unless she's going to speak again on her own, I suppose.

TED POLLAK: My name is Ted Pollak, a resident of 461 Second Street, the Clock Tower Building. I am very concerned about the proposed bus parking facility under the freeway there for a number of reasons including noise, traffic and more importantly, the effects of the diesel fumes. If I may read a paragraph out of the Chronicle today concerning diesel, "Diesel exhaust from all sorts of vehicles, mostly trucks and buses, accounts for 70 per cent of the cancer that's from air pollution in California. The state estimates..." -- this is a number from the state. Environmental working groups and advocacy groups are using the same formula as the state which estimates that emissions account for 90 per cent of San Francisco's cancer risk. To put potentially 100 diesel buses in an area where children and people live and work is, uh, something that needs to be addressed. And I don't think it's adequately addressed in the EIR. Thank you.

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MICHAEL ANTONINI: Thank you. Elizabeth Carney, and Bruce Barnes. And I would expect different comments --

ELIZABETH CARNEY: I spoke for Monica DuClaud. I'm sorry.

GERALD GREEN: Excuse me. Everybody must be treated equally. Everybody gets five minutes. You can submit your comments in writing. But we can't allow people to speak twice.

ELIZABETH CARNEY: For I was speaking for somebody else. I wasn't speaking for myself.

GERALD GREEN: Normally, you are allowed to speak one time. It has been the practice of the Commission to do so. Commissioners, if it's your desire to allow her to speak, go ahead. But in future, I would encourage you to keep track of speakers. If she spoke on behalf of someone else, normally, the Commission would not allow that. But if it is your desire, go ahead let her speak. She should also recognize that her friend could provide comments in writing, as well.

MICHAEL ANTONINI: I think I will allow you to speak. But I will ask you to keep your comments, not to echo the same comments that were spoken when you spoke on behalf of your friend. You may proceed.

ELIZABETH CARNEY: I promise I won't tell the same story. Thank you for the opportunity to speak. There are a number of us from the Clock Tower and from the neighborhood. A

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show of hands, who's here about this issue.

GERALD GREEN: Again, those people will be given a chance to speak.

ELIZABETH CARNEY: Some of them won't be. And I also have 30 people on a petition that I will submit that are also, um, neighbors and residents of the 127 families of the Clock Tower that are concerned about this issue. As I said, I hope that we'll have the chance to have the comment period extended because with respect to the tunnel construction, it's a very complex issue. Noise, vibration, air impacts. And we'd really like the opportunity to study this further so we can also assure that there won't be damage to this historical building.

The main thing that I wanted to speak to you about was that it seemed to me that the EIR does not deal with diesel emissions at all in the current draft. And it is my understanding that EPA is, has mentioned there's 40 toxicogenic air contaminants within diesel fuel. So I would hope that this omission could be replaced with an opportunity to study and analyze this further. The 127 families that live at Clock Tower all rely on air ventilation from windows. And the way that the bridge approach works, if the diesel buses were sited where it's proposed, that air would tunnel, um, along, underneath that approach and directly into our building which is open, and

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then directly into the units. So I would hope that the EIR study group could come and actually look at the site regarding this because there's nothing in the study so far that, um, that deals with this aspect at all.

The neighborhood has been going through other mitigations, The Giants Stadium has been a huge adjustment with the mitigations that were included in that transportation plan. It doesn't mention in the EIR that this neighborhood is, um, at all a part of other studies, but, um -- the earthquake project that CalTrans is working on also will take away parking during this construction and make chaos. This also is not mentioned in the EIR, that there are additional burdens that the neighborhood will be experiencing.

Finally, the traffic around the approach to the Bay Bridge is often, as you probably know, at a standstill. We have a hard time coming in and out of our building. And to consider that adding more buses to that mix, we don't think will be a very viable solution. The traffic is not addressed in the EIR, as well. So, um, thank you very much for the opportunity.

MICHAEL ANTONINI: Our next speaker is Bruce Barnes, to be followed by Norman Rolfe.

BRUCE BARNES: Is there a screen?

MICHAEL ANTONINI: Yeah.

GERALD GREEN: So you should go ahead and start speaking.

BRUCE BARNES: Good afternoon, Commissioners. My name is

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Bruce Barnes. I'm here speaking on solely with regard today on the, um, the bus, the temporary bus storage facility that is being proposed for the area bounded by Stillman Street, Perry Street, Second, and Fourth. It's a little hard to tell from this diagram; it's basically the area where the west approach of the Bay Bridge is, all the elevated ramps are -- it's used by CalTrans, surface parking operated by lot operators. There's about 700 parking spaces that serves the neighborhood and a lot of other areas.

My main concern is these diesel emission fumes and the health hazards in regards to the diesel emission fumes. I spoke at the earlier hearings, and I also wrote a registered letter in July of 2001. That letter specifically identified emissions as a major concern of the neighborhood, diesel emissions. At the time, I wasn't aware of the, um, finding with regard to cancer, and things that have recently been, uh, disclosed. And I found an EIR that -- my concerns that I addressed to the managers doing that project, they were not even addressed in the EIR report. It's silent in regards to diesel fumes in our neighborhood, and the impact of parking these buses underneath the west approach, it's been described here as basically a lid on the top of that area. Air quality is a problem down there. In our neighborhood, emissions is a problem. You know, you can go out on the rooftop of our two-story building that's 25 feet

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away from the west approach. When there's no traffic, there's no sense of smell. When there's traffic, a lot of traffic sitting there idling and backed up, there's a whole different sense of smell.

I think that other, alternative sites ought to be explored. The question came up earlier in the prior EIR that was being reviewed as to where the AC buses were going to be stored. Right now, as I read the report, they have not found a temporary home for the Golden Gate buses. But they're to be stored permanently -- based on this report, I shouldn't say permanently. Um, they're going to be housed during the day between Second, Fourth, excuse me, Third, Perry and Stillman. And the AC buses are supposed to be stored between Third and Second. There's roughly, roughly about 190 buses in the EIR report. I think more came out. But I think there will -- some buses are going to be stored on ramps, depending upon what alternative is finally decided on, how the, the loops are going to be done, and the ramps are going to go into the new facility.

Our neighborhood's been bracing for the last two to three years for the start of the reconstruction of the, um, overhead structure. Basically, five to six lanes are going to be rebuilt right in our front doors over the next roughly seven years. I understand the project -- the bids were received last week. It's ready to be awarded. You know,

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this neighborhood, we're losing parking, we're losing our street for periods of time during this construction. And, um, when we get all done, we'd like to see something back that we were promised which is adequate parking. And now that we're being faced with inheriting all the buses. We would like to see that the Commission really do their job on this EIR, and really look at alternative sites, especially when a site hasn't been identified for Golden Gate, where their buses will be stored while they build this facility. Maybe a bus storage facility should be designed early and built somewhere else that could not just be used in the interim, but could be permanent and a facility more conducive to -- maybe an open-air facility, and the emissions wouldn't be as much. The impact wouldn't be as much as on other places.

I currently have a school in my building, 18 of the last 22 years. We're in the process now of negotiating a lease with a new charter school for about 60 kids. Our building would be across from what looks like to be the entrance to the bus --

MICHAEL ANTONINI: Thank you, Mr. Barnes. Mr. Rolfe, Norman Rolfe, to be followed by Andrew Littlefield.

NORMAN ROLFE: I'm Norman Rolfe. I'm the transportation chair for San Francisco Tomorrow. We're in the process of working up our comments on this. It's going to be quite

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extensive. I'll hit a few highlights here as to what will be in it with the transportation aspects, though this may address other aspects.

And one of the things, as far as alternatives to the study are adopted, the tunneling alternative for the Caltrain downtown extension should be the preferred alternative. That's the one where there will be the least disruption and taking of property. I'll address that in a minute. It's very important that, that, that separation between 16th Street -- 16th -- start over. It's 16th Street. Can you hear me now? Again, very important to create, separate to accommodate the greatly increased number of transit that's anticipated in the future. Therefore, there should be an additional alternative study that has the Caltrain underground, just north of the north portal tunnel number one and then continue underground from there. There should be further study given to minor changes in routing. When we send our written comments in, we will enclose a drawing illustrating this additional underground and possible other small, little changes in route to reduce if amount of property taken.

Now as for the terminal itself, the second Commission alternative should be the preferred alternative. The reason for that, this is the one that allows platforms wide enough to accommodate high speed trains in the future. Our

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proposal for track arrangement is different than that one shown in the EIR. Once again, we'll have a drawing in the packet to illustrate that. We feel that this track arrangement will create a better operating environment and less impact than proposed in the EIR. The second alternative will not permit platforms long enough to permit high-speed trains. That should not be, should not be pursued. And the western bus alternative, that's the one which is not in the loop, should be preferred because that would offer the best potential for development, and also it will probably result in a superior urban environment. And at this point, I think I'll wind up for it now, as you can see, there's quite a bit more in this. You will receive a multipage letter which will address other things besides the transportation aspects.

MICHAEL ANTONINI: Thank you. Mr. Littlefield, Andrew Littlefield, to be followed by Peter Winkenstein (sic).

ANDREW LITTLEFIELD: My name is Andy Littlefield.

MICHAEL ANTONINI: Bring the mike up a little more.

ANDREW LITTLEFIELD: Hi. My name's Andrew Littlefield. I'm a resident of 461 Second Street, on the board of directors of the homeowners association.

We would like to request an extension in terms of the deadline associated with written responses to the EIR associated with this agenda item. Unfortunately, this EIR

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was only brought to our attention merely two weeks ago. It's a complex, comprehensive EIR. We would like to provide the appropriate response, particularly as today, they were a number of people very concerned with regards the impact of the diesel fumes, and the air quality inside their homes. What we'd like to request is a delay or a postponement of the deadline for written comment to January 30th, 2003. Thank you.

MICHAEL ANTONINI: Thank you. Our next speaker is Peter Winkelstein, to be followed by Arthur Meader.

PETER WINKELSTEIN: My name is Peter Winkelstein. I'm here representing SPUR, San Francisco Planning and Urban Research Association, and the Culture and Urban Policy Committee. We are reviewing this EIR, and we'll submit written responses next week.

And I just want to say today that SPUR has been involved with this project in the transbay area very actively for many years. And we support the project very strongly. We also support the preferred alternatives that Mr. Rolfe just pointed out to you. And, uh, we feel that in general, the EIR is an adequate EIR.

There are a few things in the financing which we have concerns about. And, uh, there seem to be some mathematical, possible mathematical errors. For example, both of the alternatives show the same income from the sale

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of the abandoned CalTrans land which, of course, is impossible because in one case, there's a loop that uses a lot of the land. In the other, there isn't. Similarly, the tax increment financing is shown to be the same which again can't be the same because you can't develop as much with the loop ramp alternative. We will submit the rest of our comments next week. And I thank you for your time.

MICHAEL ANTONINI: Thank you, sir. Our next speaker is Arthur Meader, to be followed by Mary Anne Miller.

ARTHUR MEADER: Good afternoon, ladies and gentlemen. I too live at the Clock Tower, Second and Bryant Streets. I'm would like to reiterate the other comments. I feel like this is a stealth report. I have no idea how much money is involved in these projects, but it's a heck of a lot of money. And I think we should be afforded some time to respond to some of the issues, particularly, to reiterate, concerning traffic, diesel, and wind issues around that area.

I know from personal experience that the traffic in that area is a nightmare. And that's quite a bit of the time. To add, I don't know how many buses into that mix will only make things worse. There have to be some better and more viable alternatives. Running closer to downtown, I think that's certainly possible.

The issue about air quality cannot be overstressed.

Diesel pollutants are serious matters. And I do not believe that this report adequately addresses that at all. With regard to the Caltrain issue, and this may be somewhat of an editorial comment, there is a system in place now that I think the city already has spent a lot of money on, basically the N-Judah line which connects perfectly well with Caltrain at Fourth and Townsend. It's a great system. It works very well. I see absolutely no need for the disruption for God knows how long of Second Street or any other street to run an underground train so people from the Peninsula can get to work five minutes faster than they did already.

So I would ask that you again allow us additional time for comments, and to respond what is a complex issue involving matters of science. We're not engineers. And we need to have at least have an opportunity to hire people to address these issues. Thank you very much.

MICHAEL ANTONINI: Thank you, sir. Our next speaker, Mary Anne Miller, to be followed by Pamela Duffy.

MARY ANNE MILLER: Mary Anne Miller, adding to the San Francisco Tomorrow comments. But we'll have your letter to you by the end of next week. My assignment was to do the urban design issue and also preservation issues, just the adequacy of the document the friendliness of it to the public. We, after all, are just members of the public.

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So we are trying to discover, in fact, whether we can understand this project's graphics. I went to the Xerox shop. And I tried to paste together 13 drawings. And I don't even think I've got it right. Otherwise, you don't find the project described graphically. You see certain drawings in there, schematics; they don't say if it's the existing or the proposed. Some of them tell you it's one of the alternatives. But this was kind of fun to do. I recommend it to you. Go home, Xerox it, paste it together. On the match lines, I found one drawing missing. Drawing number 205 is just sort of not there. So I couldn't complete my little patchwork there. But it was helpful to do the patchwork on the effort here in order to understand what buildings will be demolished.

We have three historic districts, one a national registered historic district. San Francisco Tomorrow's very concerned about urban design and the overall impacts of this project on a part of the city that ought to be friendly to pedestrians. It surely is an opportunity for housing, retail, commercial as well as, of course, for this wonderful new terminal. There are no graphics that will help you to take the very well-evaluated historic resources that are in Chapter 5, I believe. And you can't take them and go find them on a map. So you have to paste together another series of things, and highlight with your yellow highlighter or

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whatever you want to do where those buildings are to be demolished. And you have to find the street labels, the north arrows to get all this right. So the graphics are really flawed. I don't want to belabor that. In trying to decide, whether -- you go from one alternative to another. You have three of the National Historic Register sites that will be lost in one alternative. You have 13 in another alternative.

This was told me by the planner, Joan Kubler, who is not here today. We met with her to try to get clarification on this document. It's very hard. She brought in cardboard boxes --literally two, and she had several more in her cubicle -- of the background reports that had been done for this EIR. Now, you know, I said to her, "Well, Joan, couldn't we have a bibliography so we can ask you in the future. This project is going to take 8 years, maybe another 20 with the Redevelopment Area; couldn't we have a bibliography with only one sentence of paragraph of the EIR? There's not a reference, footnotes, no bibliography. So we're just looking for -- how can the public access the information? How can you access the information to make the best possible decision?

San Francisco Tomorrow has this project, I mean, on a level of the approval as its highest priority. We need to do something about transit, transportation, regional

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transportation, etc. But urban design, you figure, well, maybe the Redevelopment Agency is going to solve all your problems with urban design. However, you want to look for information in documents, really evaluating, as it says three projects, the Transbay Terminal, the Caltrain Extension, the Redevelopment Area.

Let me take you to two pages in the whole document, pages 242 and 243, and they don't tell you much. They do talk about the Redevelopment Area a little bit. They say there's a full-build alternative and reduced-scope alternative. Then you go to the next two pages. You have a couple of fairly good graphics. You have a chart, anyway -- you can't really read it from this. But there's a chart there on 244, and then there's one over here -- which I find the most, it's an attempt at being informative. Here's the outline of the Redevelopment Area. But of course, it's so faded you nearly can't see it. All you can see is turquoise squares accompanied by areas that tell you how many housing units, how much this, and how much that. This is not an urban design evaluation. I don't know how I find out whether this is a good project or not. I looked in the back and saw a graphic. I was very hopeful when I saw it. Then I saw it's a computer simulation, here, this isn't coming to you. MICHAEL ANTONINI: Thank you, Ms. Miller.

MARY ANNE MILLER: All right. It's not adequate. If it

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were built that way, it would be a horror. And I think Redevelopment agreed with me when I talked with them on the phone.

MICHAEL ANTONINI: Thank you. Pamela Duffy, then Jennifer Jennifer Clary.

PAMELA DUFFY: Good afternoon, commissioners. My name is Pamela Duffy. I'm with Coblentz, Patch, Duffy and Bass. We represent the owners of 301 Mission Street which is probably probably adjacent to the transbay terminal to the east. We will, as will many others, have a detailed comment letter to submit before the closing of the comment period.

Off my agenda, but I do think with a project of this complexity, which at least as suggested has this kind of impact on a small community could withstand another couple of months for people to get comfortable with the document.

Fundamentally, we believe that our exciting, 320-unit housing project which is currently undergoing Planning Department review at 301 Mission Street, and the equally exciting and in fact essential Transbay Terminal may go forward in harmony.

COURT REPORTER: Please slow down for the record.

PAMELA DUFFY: You sound like my mom.

COURT REPORTER: Sorry, maÆam, itÆs my job to make the record.

PAMELA DUFFY: Fundamentally, we believe our housing project which is currently undergoing Planning Department review is adequate.

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An adequate Transbay Terminal is moving forward. But we believe the Transbay EIS/EIR could be more sufficient, particularly with regard to the impact from the second to mission alternative and acting as a disclosure document for you and other decisionmakers. That alternative from Second to Mission cuts a broad, 45-foot deep swath across our site, and also contemplates doing the same tunnels all the way down Mission Street.

I know that only from deduction. It actually doesn't discuss the cumulative impacts at all of that alternative. It neglects several important areas and doesn't adequately address economic impact, including the loss of the vital tax increment associated with 301 Mission Street which ironically is included in part of the economic feasibility analysis for the Redevelopment Project Area.

It fails -- in so failing to discuss the economic impacts of the Second to Mission alternative, it begs the question of what the economic feasibility of that alternative itself is. It proposes massive excavation the length of Mission Street, the cumulative impacts of which are ignored. There is no discussion of the hazardous materials effects, noise, air quality, or vibration effects on the properties adjacent to Mission Street once it runs on down.

The real focus ought to be the scientific information

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that's in the EIR about these alternatives, particularly the Second to Mission alternative. The graphics and the scientific engineering analysis is so vague as to make the feasibility of the Second to Mission alternative very doubtful. This is the reason we believe the EIS/EIR so radically understates the impacts of this 45-foot tunnel that starts out across the vast majority of 301 Mission, and then proceeds down Mission Street.

Fortunately, there is an alternative in the EIR/EIS, that is listed as the environmental preferred alternative and to which SPUR referred earlier. That alternative reduces the operating costs, eliminates two platforms, reduces acquisition costs, increases the tax increment, minimizes disruption on Mission Street, a traffic-preferential street, reduces excavation and the related air-quality effects, and is clearly far more compatible with surrounding economic opportunities. It generally reduces the impacts on land use, not very well covered in this EIS, displacement, socioeconomic fiscal noise vibration, existence of utilities. It also eliminates conflict with existing transportation and transit systems that would occur as the result of tunneling down Mission Street.

Frankly, when the EIS/EIR so clearly such a preferable alternative -- in fact, in the draft, reaches such

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conclusion -- we should pursue it. But if there's a suggestion, a preferred alternative positive Second to Mission Street, the EIR is woefully inadequate. As Commissioner Lee inquired about, the standards and alternatives are different from the California Environmental Quality Act and require a high degree of analysis for alternatives which the EIS/EIR does not present.

COURT REPORTER: Could I get the name of your organization again, ma'am?

PAMELA DUFFY: This is great. It's Coblentz, Patch, Duffy, and Bass. And I'll give you my card. Thank you.

MICHAEL ANTONINI: Thank you. Speaker Jennifer Clary, and if there's anyone else after that, we'll take them after that.

JENNIFER CLARY: I promise to take much less than five minutes. My name is Jennifer Clary. I'm president of San Francisco Tomorrow. As you can infer by the number of people here today, we're very, very interested in this project and this document. Norm Rolfe wanted to correct an earlier speaker, and to remind you that Proposition H in November 1999 passed with almost 80 per cent of the vote and designated an extension to Caltrain and a new Transbay Terminal, and continued urban design comments.

Also, Mary Anne was continuing with the urban design comments. One of the difficulties is the extent to which decisions are going to be made based on this EIR. We

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understand it's a Redevelopment Area. This is a program-level EIR, but rezoning will still occur based on this. Currently, there's nowhere for the design plan, no picture in the document saying where the EPA says is and what it will look like. There's no shade diagrams. You don't understand what the shadow impacts are going to be in the area. There's no urban design plan yet. We understand Redevelopment is behind and that they'll engage someone soon. But we feel there has to be a process in the EIR to have that completed. Either you incorporate a requirement for it in the EIR with some specific requirements, or you recirculate the EIR later, once you have the urban design component completed.

Really quickly, there are water impacts for this project. Whenever you increase the density of an area, there's increased pressure on our sewer system. We feel that needs to be weighted in this document. Also, we're very -- Joan Kugler was very helpful. We met with her. She showed us documents. We dug in the boxes. I was looking for the analyses of hazardous materials. I found a 1995 analysis which had an estimate for $5 million for disposal of hazardous materials. I'm not sure yet because they haven't gotten back to me yet as to what kind of update they did for the purposes of this document. I know that they did no new soil testing. But I was hoping that based on other,

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um -- projects in the area like Mission Bay and the ballpark that, that they have a better idea of the amount of soil removed and where it's going to have to disposed of, the level of toxicity in the soil. You'll get a lot of writing. Thank you.

MICHAEL ANTONINI: I think we had one more gentleman who wished to speak. Come forward, sir, and state your name.

GEORGE YAMAS: My name is George Yamas, Y-A-M-A-S. I'm the owner of a building on Stillman, and have been for 25 years. I wanted to basically support the people that feel it is not a compatible use to put the buses storage there for the obvious reasons, some of which we already heard; regard residential commercial usage etc.

I'd also like to point out to you that it seems to me that the developers that will be developing the project along with the Transbay Terminal have a responsibility to find a less dense, a less controversial, uh, place to store those buses as part of the project. And, um, there's no denying that putting that storage at that location is going to interfere with the quality of life of a lot of residents, a lot of tenants. And the diminish the value of people's property. That seems like an unfair transfer of wealth and sense from the developers to, to the local people. They've been supporting that for a long, long time in that area.

The other thing I'd like to point out is that all the

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proposals I've seen are stressing more residential construction in that area. It seems to me that's a very incompatible use, to encourage more residential use, then people can get sick with the diesel fumes, the traffic and safety issues, etc., involved with parking some buses there, thank you.

MICHAEL ANTONINI: Thank you. And I would ask if any other people wish to comment publicly on this item, please come forward now.

Saying that, I'm going to close public comment on item number seven on today's calendar, the Transbay Terminal Caltrain Downtown Extension Redevelopment Project. And I'd like to ask my fellow commissioners if they have any comments in regards to that at this time. Commissioner Bill Lee.

WILLIAM LEE: I think the, um, the issue regarding diesel is a major issue, and as you may be aware, the Board of Supes has requested Muni within the next four months convert all the buses to natural gas. But I think there's a misconception by the public that diesel is in itself a carcinogenic. Diesel is a mix of exhaust from oils that are burned. Some of it could be carcinogenic. Some of it could not be.

We talk about carcinogens. A lot of people have a misnomer. Quite a few of the things you eat and wear are

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carcinogenic. The question is, how potent is the carcinogen? I would ask the Planning Commission to work with the Bay Area Air Quality Management District and include in your report their reviews on diesel. If they don't have the information, go to EPA, and they will provide you with updated information regarding the diesel issue. I think the public also has a misunderstanding that under Bay Area quality management district standards included here. You should look at the particular matter, the standard. These are particular matters you're looking at with regards to diesel exhaust. That's particle size. If it's between one and ten microns, that is the size you breathe in and out. If it's larger, the likelihood of you breathing it in is small because it's too heavy and will fall out. Plus in your nose and mouth, it wouldn't go deep into your lungs. If it's less than one micron, you would breathe it in and it will go out again.

I think the public, we would be well served to educate the public regarding diesel. If there's any way for the Planning Department to do that, we would appreciate it.

GERALD GREEN: That might assist us in developing some response to this. In trying to form some response to this, your desire is to, that this document includes something educational in terms of what the standard is?

WILLIAM LEE: That is correct. So the public may read the

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document -- we used to have a cancer of the week. When they had it the last time was when they used, tested on bacteria, called the Ames Test. 90 per cent of the stuff was carcinogenic. The public believes if it's carcinogenic, you get it. But we should worry about mutagens which carry them to the next generation.

What I'm concerned about, everybody is using this as an issue about carcinogens. I think the risk management documents are out there by EPA and other regulatory agencies that will be very helpful in explaining the risks regarding diesel. Commissioner Hughes?

KEVIN HUGHES: Well, I believe that a environmental impact report that is adequate and accurate as it relates to this project should contain with respect to, to diesel emissions some study of what speed and wind direction as it relates to the freeway overpass. Um, I believe we should look at the graphics; the graphics do not fit, if they do not have a good working relationship with preceding, succeeding graphics, then we might review that. Certainly should include shadow impacts.

And with respects to a request for extension, I don't see any harm. I would lean towards, you know, an additional two weeks, on, on extension, I think January 30th is a little far out, far away. But I believe that, um, an additional two weeks would not unduly impact the Department.

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GERALD GREEN: No. It's not going to affect the Department. It might affect others. Your suggestion at this stage is to extend the written comment period for two weeks?

KEVIN HUGHES: Correct; right.

MICHAEL ANTONINI: Okay. Thank you, Commissioner Hughes. Any other comments from commissioners?

I just wanted to add, one thing I noticed in here, that deals with this diesel question. And there is allusions in the report to the possible inclusion of a, a tube to allow trains to run in other directions, perhaps under the Bay towards the East Bay as part of the project. I think that's very farsighted. Certainly, wherever possible, I would encourage projects like this, to you know, try to do electrification and wherever we can stay away from diesel. In reality, that is, most of the buses that come in from AC Transit and from the Marin buses are diesel or are going to be, at least above-ground-type things, in the foreseeable future. So I'm going to close comment on this item now. And the only thing that remains on our agenda is opening up public comment, unless you had some remarks.

GERALD GREEN: No, I heard. And I'm wondering whether that is the consensus of the commission that you'd like to see additional time for written comments. Other than that, we received a substantial amount of comments that we were going to get to work on. I'm not sure what two weeks will

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generate in terms of new or additional comments, but it is, it is going to affect the timeline. But nonetheless, it's your call. You are going to have to feel comfortable that the document is adequate before you're served by it.

MICHAEL ANTONINI: Director Green, do we need a motion to vote on this item?

GERALD GREEN: I think that if it's a consensus of the Commission, that that is probably enough.

MICHAEL ANTONINI: I don't know. Maybe we can poll the Commission.

LAWRENCE B. BADINER: Go ahead.

MICHAEL ANTONINI: I personally would vote not to extend. I would like to see what the other commissioners feel on this item.

BILL LEE: I can go halfway. Extend it for one week.

MICHAEL ANTONINI: Commissioner Sue Lee.

SUE LEE: I would support a two-week extension.

MICHAEL ANTONINI: Commissioner Hughes.

KEVIN HUGHES: I would support a two-week extension.

MICHAEL ANTONINI: We have two votes for two weeks.

SECRETARY IONIN: I just talked to the City Attorney --

GERALD GREEN: We're going to extend it to -- what I hear the commission saying, we're going to extend it to December 20th to provide more comments. And we'll go from there.

MICHAEL ANTONINI: Okay, very good, Director Green. So it's

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extended until December 20th.

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